

EXHIBITS

A-1 THROUGH A-14

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522
Tax ID No. 25-1235773

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

	<u>Fees</u>	<u>Costs</u>	<u>Payments</u>	<u>New Balance</u>
372.01 - Expenses & Advances	\$0.00	\$2,406.08	\$0.00	\$2,406.08
372.02 - General	\$14,977.00	\$0.00	\$0.00	\$14,977.00
372.03 - Schedules, Sofa, etc.	\$20,843.75	\$0.00	\$0.00	\$20,843.75
372.04 - Monthly Financial	\$6,583.50	\$0.00	\$0.00	\$6,583.50
372.05 - Executory Contracts	\$13,875.00	\$0.00	\$0.00	\$13,875.00
372.06 - Conferences - Debtor	\$11,571.00	\$0.00	\$0.00	\$11,571.00
372.07 - Disclosure Statement	\$19,030.00	\$0.00	\$0.00	\$19,030.00
372.08 - Plan	\$18,251.50	\$0.00	\$0.00	\$18,251.50
372.09 - Claim Matters	\$5,749.00	\$0.00	\$0.00	\$5,749.00
372.10 - Misc. Motions	\$41,980.00	\$0.00	\$0.00	\$41,980.00
372.11 - Miscellaneous AP's	\$35,680.50	\$0.00	\$0.00	\$35,680.50
372.12 - Sale of Assets	\$11,764.00	\$0.00	\$0.00	\$11,764.00
372.13 - Tax Matters	\$1,371.00	\$0.00	\$0.00	\$1,371.00
372.14 - Prep. of Fee Apps	\$2,467.00	\$0.00	\$0.00	\$2,467.00
GRAND TOTAL	<u>\$204,143.25</u>	<u>\$2,406.08</u>	<u>\$0.00</u>	<u><u>\$206,549.33</u></u>

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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.00

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

SCBS # 372.00

Balance
\$0.00

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789 Bessemer Street
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September 28, 2015
372.00
Invoice # 656

	<u>Amount</u>
Balance due	<u>\$0.00</u>
Client funds transactions	
Previous balance of Retainer	<u>\$14,587.50</u>
New balance of Retainer	<u>\$14,587.50</u>

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Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.01 - Expenses & Advances
Invoice # 15340

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Additional Charges :

	<u>Amount</u>
12/10/2014 Postage charges	67.20
12/16/2014 Postage charges	44.66
12/17/2014 Postage charges	22.50
12/22/2014 Filing Fees	9.00
01/06/2015 Postage charges	28.80
01/07/2015 Postage charges	81.60
01/12/2015 Travel Expenses = GTS	113.85
01/30/2015 Photocopies	90.70
02/03/2015 Postage charges	11.50
02/06/2015 Costs Advanced - Jet Messenger	7.00
02/27/2015 Photocopies	78.10
03/09/2015 Travel Expense - Parking (GTS)	4.25
Travel Expense - mileage (GTS)	154.90
03/23/2015 Filing Fees	30.00
Postage charges	1.38
03/30/2015 Postage charges	2.09
03/31/2015 Postage charges	47.04

	<u>Amount</u>
03/31/2015 Photocopies	78.10
04/01/2015 Postage charges	195.16
04/07/2015 Postage charges	0.96
04/13/2015 Postage charges	0.96
04/23/2015 Postage charges	15.84
04/29/2015 Postage charges	77.76
04/30/2015 Photocopies	173.90
05/05/2015 Postage charges	97.56
05/13/2015 Postage charges	77.76
05/22/2015 Postage charges	110.40
05/26/2015 Postage charges	0.48
05/29/2015 Photocopies	102.50
06/01/2015 Fax charges	0.30
06/02/2015 Postage charges	0.98
06/26/2015 Photocopies	154.70
Postage charges	63.45
Postage charges	16.44
06/29/2015 Postage charges	43.17
07/07/2015 Postage charges	16.93
07/10/2015 Postage charges	17.63
07/13/2015 Photocopies	36.00
08/03/2015 Postage charges	330.53
Total additional charges	<u>\$2,406.08</u>
Balance due	<u><u>\$2,406.08</u></u>

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Attn: Mark Turner, Executive Director
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Meadville, PA 16335

September 28, 2015
372.02 - General
Invoice # 15341

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

			<u>Hours</u>	<u>Amount</u>
12/08/2014	GTS	Review background documents from Mark Turner re history of relationship between CLP and Economic Progress Alliance.	1.00	385.00
12/10/2014	GTS	Conference with JSL re organization electronic and paper files for case.	0.20	77.00
	JSL	Review/analyze and summarize US Trustee guidelines and requirements for client	1.30	390.00
12/11/2014	RBR	Conference with GTS re: numerous issues pertaining to case strategy generally.	0.90	346.50
	GTS	Conference with RBR re numerous issues regarding start up of case and case strategy.	0.90	346.50
	GTS	Review memorandum opinions and orders regarding restriction in deed and related issues regarding Debtor's status and history; review background on CLP for possible inclusion in Declaration.	2.00	770.00
12/12/2014	JSL	Review/analyze requests for information from U.S. Trustee and prepare spreadsheet for upcoming deadlines, hearings, and responses dates	1.10	330.00
12/15/2014	GTS	Review Deed for property received from Tera Powell	0.20	77.00
	GTS	Review Summit Township pleadings from 1998 raising fraudulent transfer issues and seeking monetary judgment.	0.20	77.00
	YJK	Review returned mail and notices from BNC re: undeliverable addresses; research updated addresses & draft and file Notices of Change of Address.	0.40	46.00
12/16/2014	GTS	Review open matters list and review timeline and due dates for matters for the US Trustee	0.20	77.00

		Hours	Amount
12/18/2014	YJK Review returned mail from BNC; research updated addresses and draft Notices of Change of Address; email to GTS re: same.	0.40	46.00
12/19/2014	YJK Conduct PA UCC search and email to GTS re: results	0.30	34.50
	GTS Review US Trustee Guidelines; review binder of materials forwarded to US Trustee and review declaration filed with Court re background for conference call with US Trustee office.	1.60	616.00
	GTS Conference with US Trustee - Steve Albright and Mark Turner.	0.90	346.50
12/22/2014	JSL Telephone call from creditors regarding service list	0.20	60.00
12/23/2014	JSL Correspondence and discussions with debtor management and U.S. Trustee re: DIP Account and utility deposit payments	0.80	240.00
01/05/2015	YJK Review email from JL re: schedule status; compile draft of schedules and exhibits and email to JL re: same	0.30	34.50
01/06/2015	GTS Conference with Mark Turner, Gene Herne and Jim McGraw re status of case and case strategy moving forward; follow-on discussion with Mark Turner.	0.90	346.50
	GTS Telephone call with Bill Vadonic at Tribune Review re status of hearings.	0.20	77.00
01/07/2015	GTS Telephone call with John Steiner re case status and likelihood of creditors' committee formation.	0.40	154.00
01/09/2015	GTS Conference with JSL re meeting in Meadville yesterday and open issues on schedules.	0.20	77.00
	GTS Review state court pleadings re beach club insurance.	0.70	269.50
01/14/2015	JSL Review/analyze and circulate 341 Meeting Notice and Order setting claims bar date	0.30	90.00
01/15/2015	CLR Research requirements necessary to divest a public trust of its non-profit/public status, particularly as it relates to the potential for-profit sale of real estate assets.	1.50	75.00
01/20/2015	JSL Research re interpretation and application of control to determine insider status	0.40	120.00
01/26/2015	JSL Review/analyze current pleadings, including second omnibus order scheduling hearing dates	0.30	90.00
02/06/2015	GTS Review detail of map of park and surrounding land provided by Mark Turner.	0.20	77.00
	JSL Review/analyze recently filed pleadings, upcoming deadlines and open items	0.30	90.00
	GTS Review projected cash flow statement.	0.10	38.50
02/26/2015	CLR Research St. Francis/UPMC case as it relates to the CLP assignment	4.00	200.00
03/04/2015	JSL Review/analyze recently filed pleadings and orders	0.20	60.00

			Hours	Amount
03/05/2015	GTS	Review and organize files for meeting tomorrow with US Trustee	0.30	115.50
03/06/2015	JSL	Review recently filed pleadings	0.20	60.00
03/09/2015	JEF	Researched and read caselaw pertaining to 327(e)	2.10	252.00
03/10/2015	JEF	Continued researching cases pertaining to 327(e) and 327(a) and began drafting summaries.	2.80	336.00
	GTS	Review and reply to message from Roger Poorman re schedule for conference call.	0.10	38.50
03/11/2015	JEF	Continued drafting case summaries pertaining to 327(e) and 327(a).	5.80	696.00
	GTS	Conference with Roger Poorman and Jeanne Lofgren re case background for Bridgeway Capital.	1.10	423.50
	GTS	Review status and open issues on financing.	0.20	77.00
03/12/2015	GTS	Review and reply to email from John Swick re Peter Acker comments and strategy regarding property sale.	0.10	38.50
03/13/2015	JSL	Review/analyze recently filed claims and pleadings	0.20	60.00
03/16/2015	GTS	Review §327(e) research regarding possible retention of professionals.	0.40	154.00
03/18/2015	GTS	Review summary of research on §327(e) retention of professionals.	0.50	192.50
	GTS	Telephone call with Justin McCall re possible DIP loan from Bridgeway Capital and issues related to case and case strategy	0.60	231.00
03/19/2015	GTS	Review status of Bridgeway Capital response to possible DIP loan and exchange email with Justin McCall.	0.10	38.50
03/20/2015	GTS	Conference with JSL re timing on Park Restoration matters; mediation schedule; update on financing and status of plan filing deadline.	0.10	38.50
03/24/2015	GTS	Telephone call Atty. William Jordan's office re authorization to withdraw suit against CLP Management Group, Inc.	0.20	77.00
03/26/2015	CLR	Research CLP's divestiture of its charitable purpose, including case law and the Restatement Third	3.40	170.00
	CLR	Research re divestiture of charitable purpose and case law re the Restatement Third.	3.20	160.00
03/27/2015	GTS	Conference with JSL re open matters to attend during my absence next week	0.20	77.00
03/31/2015	CLR	Continued research re divestiture of charitable purpose.	3.30	165.00
04/01/2015	JSL	Review/analyze recently filed pleadings and claims	0.20	60.00
04/06/2015	GTS	Conference with JSL re Park Restoration matters and required written response; DIP financing proposal; mediation statement and open issues	0.40	154.00

			Hours	Amount
04/06/2015	JSL	Review/analyze recently filed pleadings, including Third Order Scheduling Omnibus Hearing Dates; calendar same with response and filing deadlines	0.50	150.00
	JSL	Conference with G. Snyder re: outstanding CLP issues	0.50	150.00
04/10/2015	GTS	Review issues regarding possible need for new banking accounts and issues related to seasonal employees	0.30	115.50
04/12/2015	YJK	Review undeliverable/returned mail; research to determine if updated addresses exist; re-send returned items and update master service list	0.60	69.00
04/13/2015	JSL	Review/analyze recently filed claims and pleadings	0.20	60.00
04/14/2015	GTS	Telephone call with Roger Poorman re update on DIP loan status and conclusion with Bridgeway Capital	0.10	38.50
	JSL	Review cottage owner mailing returns and discuss with C. Torrie	0.50	150.00
04/15/2015	GTS	Review National Fuel termination notice and forward same to Mark T. and Cheryl T.	0.20	77.00
04/20/2015	YJK	Review spreadsheet from JL & Cheryl re: cottage owner addresses; confer with CH re: same	0.20	23.00
04/21/2015	JSL	Emails regarding extension of exclusivity and Park Restoration	0.40	120.00
04/27/2015	YJK	Review and revise letter to Larry Bolla re: automatic stay violations re: Crawford County Tax Claim Bureau; email to GTS re: same	0.20	23.00
	JSL	Draft management services agreement with new entity	1.50	450.00
04/28/2015	GTS	Telephone call from Meadville newspaper re results of hearing.	0.20	77.00
04/29/2015	GTS	Telephone call with John Swick re status of financing with EPACC	0.40	154.00
04/30/2015	GTS	Review proposed commitment letter from EPACC	0.20	77.00
05/01/2015	GTS	Review status of financing proposal.	0.10	38.50
	GTS	Review term sheet for DIP loan and review form of motion seeking approval.	0.20	77.00
05/04/2015	GTS	Telephone call with John Swick re status of proposed loan from Northwest Commission and open issue regarding land use restriction	0.40	154.00
	JEF	Administration-prepared envelopes for mailing.	0.20	37.00
05/05/2015	JSL	Review and manage docket and recently filed pleadings	0.30	90.00
	JSL	Conference with G. Snyder re: general bankruptcy matters and strategy	0.20	60.00
05/13/2015	JSL	Review/analyze and manage recent docket entries	0.20	60.00
05/19/2015	JSL	Review and manage recent docket entries and claims	0.30	90.00
05/21/2015	GTS	Review proposal regarding liquor license	0.10	38.50

			Hours	Amount
05/22/2015	GTS	Review email from Fran Murrman re LCB license; forward to Mark Turner and John Swick; review and reply to email re same.	0.20	77.00
	GTS	Draft email to Fran Murrman re authority regarding liquor license and related issues.	0.10	38.50
05/26/2015	JEF	Administration-completed excel document with filing and response deadlines.	0.50	92.50
	JEF	Reviewed spreadsheet of filing dates, response dates and hearing dates.	0.20	37.00
	JSL	Review and manage recent docket entries and filed claims	0.50	150.00
05/27/2015	JEF	Researched what authority a 50/50 owner has to enter into a contract on behalf of an LLC when there is no operating agreement.	3.20	592.00
	JEF	Researched statutes and case law re: in the absence of an operating agreement, does a 50/50 owner have the ability to enter into a contract on behalf of the LLC?	0.70	129.50
	JSL	Draft interim management agreement for Conneaut Lake Hotel	1.10	330.00
05/28/2015	YJK	Review and reply to email from JL re: cottage owners	0.20	23.00
05/29/2015	YJK	Review and revise letter to Judge Spataro re: Park Restoration; email to GTS re: same	0.40	46.00
06/01/2015	YJK	Finalize letter to Judge Spataro re: Popovich/Park Restoration; draft fax re: same	0.30	34.50
06/03/2015	JSL	Review and manage recent docket entries in insurance litigation and main proceeding	0.30	90.00
06/04/2015	YJK	Telephone call with the Erie County Clerk's office re: undeliverable addresses; email to GTS & JL re: same	0.20	23.00
	YJK	Review updated undeliverable address analysis and begin draft of Notice of Change of Adresses	0.40	46.00
	YJK	Continue drafting Notice of Change of Addresses	0.30	34.50
06/05/2015	YJK	Finalize Notices of Change of Addresses and email to JL re: same; multiple conferences with Jeanne re: additional parties	0.80	92.00
06/08/2015	JSL	Review and manage recent docket entries	0.30	90.00
06/17/2015	JSL	Review/manage recent docket entries	0.30	90.00
06/19/2015	JSL	Review/monitor docket entries in insurance litigation and main case	0.30	90.00
06/23/2015	JSL	Conference with G. Snyder re: various matters concerning the estate including Park Restoration, the insurance litigation, and retention of certain professionals	0.40	120.00
	GTS	Conference with JSL re status of insurance litigation; Park Restoration termination of agreement and retention of ordinary course professionals.	0.40	154.00

		<u>Hours</u>	<u>Amount</u>
06/24/2015	JSL Review and comment on letter from U.S. Trustee's Office re: proof of insurance, insurance premium financing agreement, and draft form of emergency motion for approval of insurance premium financing sent from Flatiron	1.00	300.00
	JSL Email to D. Burges re: insurance premium financing analysis	0.20	60.00
07/13/2015	JSL Review/analyze and manage recent docket entries	0.20	60.00
07/27/2015	JSL Review/analyze and manage recent docket entries and confirm no response to Passport Realty retention application	0.20	60.00
08/04/2015	JSL Review and manage recent docket entries	0.20	60.00
	For professional services rendered	69.00	\$14,977.00
	Balance due		<u>\$14,977.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Catherine L. Rassman	15.40	50.00	\$770.00
George T. Snyder	17.10	385.00	\$6,583.50
Jaclyn E. Faulds	4.80	185.00	\$888.00
Jaclyn E. Faulds	10.70	120.00	\$1,284.00
Jeanne S. Lofgren	15.10	300.00	\$4,530.00
Ronald B. Roteman	0.90	385.00	\$346.50
Yvonne J. Kocher	5.00	115.00	\$575.00

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September 28, 2015
372.03 - Schedules, Sofa, etc.
Invoice # 15342

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
12/08/2014	YJK Email to GTS re: and attaching draft of schedules for client	0.20	23.00
	JSL Review/analyze draft schedules and statements	0.30	90.00
	GTS Review draft schedules and forward same to Mark Turner.	0.20	77.00
	YJK Email to GTS re: and attaching draft of schedules for client	0.20	23.00
	YJK Email to GTS re: and attaching draft of schedules for client	0.20	23.00
12/10/2014	GTS Review excel spreadsheet from Mark Turner re asset listing and values for inclusion in schedules.	0.20	77.00
12/11/2014	YJK Review additional documentation provided by client and continue draft of schedules	0.60	69.00
	JSL Draft/revise motion to extend time for filing schedules and statements	1.30	390.00
12/15/2014	YJK Review multiple emails from GTS & update schedules	0.30	34.50
12/16/2014	JSL Review/analyze initial disclosures produced by Debtor in response to U.S. Trustee requests	2.00	600.00
	JSL Correspondence to and with the U.S. Trustee's Office providing the Debtor's initial disclosures and advising on motion to extend deadlines for Schedules and Statements	0.50	150.00
12/23/2014	GTS Review information on deed and 99 year lease arrangement.	0.30	115.50
12/30/2014	JSL Review and comment on Powell deed / lease	0.20	60.00
01/05/2015	JSL Review/analyze quitclaim deeds relating to land subject to cottage leases and address with management	0.50	150.00

		Hours	Amount
01/07/2015	JSL Review draft schedules and statements and coordinate conference call with debtor re: same	0.50	150.00
01/08/2015	YJK Review valid lien list & update schedules and SOFA; email to JL re: same	0.80	92.00
01/09/2015	JSL Review/analyze current draft of Schedules and Statements and initial disclosures to US Trustee	1.50	450.00
	JSL Conference with debtor re completion of Schedules and Statements	1.20	360.00
	JSL Review/analyze map of Conneaut Lake Park and Crawford County on-line real estate records and coordinate research into current fee interest holders for various cottage parcels	0.80	240.00
	JSL Review/analyze state court litigation involving insurance proceeds from Beach Club casualty to determine scheduling of same	0.70	210.00
01/13/2015	JSL Telephone call with C. Torrie re: schedule D creditors	0.30	90.00
01/14/2015	GTS Conference with JSL re update on status of completion of schedules and sofa	0.10	38.50
01/15/2015	YJK Review updated schedule information provided by client; revise/update schedules and related documents.	4.30	494.50
	GTS Review deeds and issues related to completion of Schedule A.	0.50	192.50
	GTS Draft attachment and explanation to accompany Schedule A.	1.50	577.50
	GTS Review revisions to 20-largest list; draft comments for JK	0.20	77.00
	JSL Emails from/to C. Torrie re: revised Schedules and Statements	0.30	90.00
01/16/2015	JSL Review/analyze and comment on addendum to Schedule A	0.40	120.00
01/19/2015	GTS Review issues re updates to Schedules and SOFA	0.20	77.00
	JSL Review/analyze and revise Schedules and Statements and reconcile against initial MOR	2.30	690.00
01/20/2015	GTS Review and revise summary description for Exhibit A.	0.20	77.00
	YJK Review multiple emails re: amended 20 largest creditors; review PNC proof of claim; revise 20 largest	0.30	34.50
	GTS Review revisions to 20-largest and update on Schedule A.	0.20	77.00
	YJK Draft local amendment coversheet and email to GTS & JL re: same; email to JL re: info still needed to finalize amended 20 largest	0.40	46.00
	YJK Revise, finalize & file Amended 20 Largest Unsecured Creditors; email to JL re: same.	0.30	34.50
	GTS Review and update information for schedules including modified description of value of real property.	0.30	115.50

			Hours	Amount
01/20/2015	JSL	Review/analyze and comment on Schedules and Statements using public records search results to update Schedule G	4.50	1,350.00
01/21/2015	GTS	Review open issues on schedules and sofa	0.50	192.50
	GTS	Conference with JSL re open issues and strategy regarding completion of Schedules and SOFA	0.50	192.50
	GTS	Research re definition of Insiders and related legal impact.	1.40	539.00
	JSL	Review/analyze public records search re: status of various cottage leases and revise Schedule G	1.30	390.00
	JSL	Research re: control and insider status	2.30	690.00
	JSL	Conference with G. Snyder re: Schedules and Statements	0.50	150.00
	JSL	Draft/revise Schedules and Statements	1.00	300.00
	JSL	Email to C. Torrie re: revisions and comments to draft Schedules and Statements	0.80	240.00
	JSL	Draft/revise email to C. Torrie re: comments to revised schedules and statements	0.30	90.00
01/22/2015	JSL	Conference call with debtor re: Schedules and Statements	0.50	150.00
01/23/2015	GTS	Review status of open issues on schedules	0.20	77.00
	GTS	Review research re insiders and issues for completion of schedules.	0.20	77.00
01/26/2015	JSL	Review/revise Schedules and Statements	2.20	660.00
01/27/2015	GTS	Conference with JSL re open issues on Schedules and SOFA	0.20	77.00
	YJK	Review emails from JL re: information provided by client to update schedules and related documents; revise same and email to GTS & JL re: information still needed for completion	3.10	356.50
	JSL	Email to C. Torrie re: comments to SOFA and declaration and coordinate revisions to Schedules	0.40	120.00
01/28/2015	GTS	Review status of revisions to schedules and sofa and list of outstanding issues.	0.20	77.00
	GTS	Review and reply to open issues on Schedules and Sofa	0.30	115.50
	JSL	Review/analyze open items on schedules and statements revise and compile latest versions of same with attachments and supplements	6.30	1,890.00
01/29/2015	YJK	Review additional information provided by client; substantial revisions to schedule g & sofa; draft amended matrix & verification; email to GTS & JL re: same	2.80	322.00
	GTS	Review and revise schedules and SOFA	1.50	577.50

		Hours	Amount
01/29/2015	JSL Emails to/from Y. Kocher, G. Snyder and C. Torrie re: Schedules and Statements	0.30	90.00
01/30/2015	GTS Review and finalize schedules and SOFA	0.20	77.00
	YJK Revise schedules and modification to mailing matrix; finalize and file same; letter to US Bky Clerk re: Declaration	1.80	207.00
	JSL Review/analyze schedules and statements before filing	0.60	180.00
02/02/2015	GTS Review final filed schedules and sofa and coordinate making record copies.	0.20	77.00
02/03/2015	GTS Draft letter to Mark Turner re bound copy of final version of Schedules and SOFA	0.20	77.00
03/06/2015	GTS Travel to Court to attend §341 meeting.	1.80	346.50
	GTS Court to attend §341 meeting in Erie and related discussions with Mark Turner and Heather Sprague following meeting.	3.10	1,193.50
	GTS Court - return from §341 meeting in Erie.	2.50	481.25
03/09/2015	YJK Draft amended schedules D&G; draft amendment coversheet & confer with GTS re: same	0.70	80.50
	GTS Review and coordinate amendments to schedules D and G.	0.30	115.50
03/11/2015	GTS Review status of amendments to Schedules to revise Schedules D and G; coordinate execution and filing with JSL.	0.20	77.00
	GTS Review Park Restoration Claims issues.	0.10	38.50
	JSL Review/analyze amended schedules and statements	0.10	30.00
	JSL Email to C. Torrie re: amended schedules and revisions to Schedule B(16)	0.20	60.00
03/13/2015	JSL Conference with C. Torrie re: amended schedules	0.20	60.00
03/17/2015	JSL Email to/from C. Torrie re: updating amounts owed by Park Restoration on B(16)	0.30	90.00
03/18/2015	JSL Email to Y. Kocher re: revisions to B(16)	0.40	120.00
03/19/2015	YJK Review email from JL re: additional schedule amendments; amend schedule b, supplement to schedule b and amendment coversheet and email to JL/GTS re: same	0.60	69.00
03/20/2015	YJK Finalize, file and service of amended schedules; email to JL re: same	0.40	46.00
06/05/2015	JSL Review/revise and file Notice of Change of Addresses (Multiple)	0.80	240.00
06/15/2015	YJK Review email from JL re: 57 additional cottage owners identified by the debtor, along with cottage owners who were previously listed but determined not to own the cottages at the time of filing of the schedules, and compare to Schedule G; draft Amended Schedule G, Amendment Coversheet, Matrix and Notice Regarding Modification to Mailing Matrix; email to JL re: same	4.20	483.00

		Hours	Amount
06/15/2015	JSL Email to Y. Kocher coordinating update of Schedule G for new cottage owner addresses	0.30	90.00
06/20/2015	JSL Review/analyze and comment on Amendment to Schedule G	1.80	540.00
06/22/2015	YJK Conference with JL re: additional parties identified as cottage owners; update Schedule G, matrix, and amendment coversheet; follow up with JL re: same	1.60	184.00
06/25/2015	YJK Revise and finalize Amendment Coversheet, Amended Schedule G, Supplemental Matrix and Notice re: Modification of Matrix and file same; service of Amended Schedule G	1.20	138.00
06/26/2015	YJK Review email from JL re: amended schedule G order; review order	0.20	23.00
06/29/2015	YJK Review Order of Court re: Amended Schedule G; service of Notice of Meeting of Creditors and and Order of Court; draft Certificate of Service and email to JL re: same	0.80	92.00
	YJK Finalize & file Certificate of Service re: Amended Schedule G, Hearing Order & 341 Notice	0.20	23.00
	JSL Telephone calls from multiple cottage owners re: amendment to Schedule G	0.30	90.00
	JSL Telephone calls from/to multiple cottage owners re: Schedule G Amendment	0.50	150.00
07/01/2015	JSL Emails from/to cottage owners re: Schedule G Amendments	0.30	90.00
07/06/2015	YJK Conference with Jeanne re: cottage owners communications since the filing of Amended Schedule G; begin analysis of same.	0.80	92.00
07/07/2015	YJK Continue review and analysis of Schedule G and Amendment, and matrix and amendments; draft analysis and email to JL re: same.	1.60	184.00
07/10/2015	JSL Email from/to cottage owner re: amended schedule G	0.20	60.00
For professional services rendered		84.30	\$20,843.75
Balance due			\$20,843.75

Timekeeper Summary

Name	Hours	Rate	Amount
George T. Snyder	13.20	385.00	\$5,082.00
George T. Snyder	4.30	192.50	\$827.75
Jeanne S. Lofgren	39.20	300.00	\$11,760.00
Yvonne J. Kocher	27.60	115.00	\$3,174.00

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.04 - Monthly Financial
Invoice # 285

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
01/12/2015	JSL Telephone call with C. Torrie re: monthly operating reports	0.20	60.00
01/15/2015	JSL Emails from/to C. Torrie re: December Monthly Operating Report	0.20	60.00
01/16/2015	GTS Review issues regarding initial MOR	0.20	77.00
	JSL Conference with C. Torrie re: monthly operating reports	1.00	300.00
01/19/2015	YJK Review December Operating Report & confer with JL & GTS re: same.	0.30	34.50
	GTS Conference with JSL and YJK re initial MOR and related issues.	0.20	77.00
	JSL Review/analyze and revise December 2014 monthly operating report	1.30	390.00
01/20/2015	GTS Review status of initial report.	0.10	38.50
	YJK Review and redact December Monthly Financial Report.	0.30	34.50
	YJK Finalize & file December 2014 Monthly Operating Report.	0.20	23.00
	JSL Draft/revise and finalize and circulate December 2014 monthly operating report to U.S. Trustee's office	1.60	480.00
02/09/2015	JSL Conference call with C. Torrie re: January 2015 MOR	0.80	240.00
02/13/2015	JSL Conference with C. Torrie re: payment of utility deposits and January MOR	0.50	150.00
02/17/2015	GTS Review open issues for MOR for January	0.20	77.00
	GTS Conference with JSL re open issues on MOR	0.60	231.00
	JSL Review/analyze draft January 2015 monthly operating report and subsequent revisions	2.20	660.00

			Hours	Amount
02/17/2015	JSL	Conference with C. Torrie re: January 2015 monthly operating report	0.80	240.00
	JSL	Conference with G. Snyder re: January 2015 Monthly Operating Report	0.60	180.00
02/18/2015	JSL	Review/analyze revised January 2015 monthly operating, provide final comments, coordinate filing of same	1.00	300.00
02/19/2015	YJK	Review January, 2015 Monthly Operating Report and redact personal identifiers; file and service of report.	0.50	57.50
03/11/2015	JSL	Review and comment on February 2015 Monthly Operating Report	0.60	180.00
03/13/2015	YJK	Review and redact February Monthly Operating Report; finalize & file same	0.60	69.00
	JSL	Review/analyze revised February 2015 Monthly Operating Report	0.30	90.00
04/14/2015	YJK	Review, redact, finalize and file March, 2015 Operating Report; email to JL re: same	0.70	80.50
	JSL	Review/revise March 2015 monthly operating report	1.00	300.00
05/05/2015	JSL	Correspondence from/to C. Torrie re: professional fees & expenses in April 2015	0.20	60.00
05/13/2015	JSL	Review/analyze and comment on April 2015 Monthly Operating Report	0.50	150.00
05/19/2015	YJK	Review, redact, finalize & file April 2015 operating report	0.60	69.00
06/17/2015	GTS	Review May MOR	0.30	115.50
	JSL	Review/analyze and comment on Monthly Operating Report for May 2015	0.50	150.00
06/18/2015	YJK	Review and redact May, 2015 Monthly Operating Report; email to JL re: same	0.60	69.00
06/26/2015	JSL	Conference with R. Ragen re: employment of auditor for 2014 audit and amendment of certain operating reports	0.20	60.00
	JSL	Telephone call to R. Clayton re: scope and terms of retention for 2014 audited financials	0.10	30.00
	JSL	Review/analyze April and May operating reports for line item corrections to account for EPACC ground crew work expenses; email to R. Ragen re: same, along with form MORs in excel	1.00	300.00
07/06/2015	JSL	Review Stonecipher June 2015 invoices for inclusion in June 2015 MOR	0.30	90.00
07/20/2015	YJK	Review, revise and redact June Monthly Operating Report; email to JL re: same	0.80	92.00
	YJK	Conference with JL re: minor employees; additional revisions to June Monthly Operating Report.; email to JL re: same	0.40	46.00
	YJK	Finalize & file June, 2015 Monthly Operating Report; email to JL re: same	0.40	46.00
	JSL	Review/analyze and comment on June Monthly Operating report; review revisions thereto and coordinate filing of same	1.80	540.00

		<u>Hours</u>	<u>Amount</u>
08/07/2015	JSL Email to R. Ragen with professional fees accrued for July 2015	0.20	60.00
08/19/2015	GTS Review July MOR	0.30	115.50
08/20/2015	YJK Review and redact July 2015 MOR; review email from JL re: signature page; finalize and file MOR and email to JL re: same	1.40	161.00
For professional services rendered		<u>25.60</u>	<u>\$6,583.50</u>
Balance due			<u><u>\$6,583.50</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	1.90	385.00	\$731.50
Jeanne S. Lofgren	16.90	300.00	\$5,070.00
Yvonne J. Kocher	6.80	115.00	\$782.00

Stonecipher Law Firm

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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.05 - Executory Contracts
Invoice # 15343

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
12/04/2014	JSL Draft Motion to Assume Management Services Agreement	2.50	750.00
12/09/2014	JSL Draft/revise and incorporate background information into Motion to Assume Management Agreement and Declaration in Support of Chapter 11 Filing	4.30	1,290.00
12/10/2014	JSL Finalize draft of motion to assume management agreement	3.00	900.00
12/12/2014	JSL Conference with G. Snyder re: case strategy with respect to executory contracts	0.50	150.00
01/20/2015	GTS Review agreements for lease and management of Hotel and Beach club and review legal issues relating to potential disposition of those agreements.	1.40	539.00
02/23/2015	GTS Review strategy re Park Restoration agreements.	0.20	77.00
	JSL Draft letter to Park Restoration, LLC terminating Hotel Lease Agreement and Beach Club Agreement pursuant to their own terms	2.20	660.00
02/27/2015	GTS Review agreements with Park Restoration and basis for termination	1.30	500.50
03/02/2015	GTS Review agreements with Park Restoration for Hotel, Beach Club and McClure property and review draft termination letter and strategy re same.	1.50	577.50
	JSL Review/analyze McClure Lease Agreement and revise termination letter to Park Restoration re: same	1.20	360.00
	JSL Research re: application of 365 to unexpired leases that may be terminated by debtor without breach by the debtor	3.50	1,050.00
03/03/2015	GTS Conference with JSL re update on status of Park Restoration research	0.10	38.50
	JSL Email to G. Snyder re: application of 365 to executory contracts that can be terminated postpetition without a breach by the debtor	1.00	300.00

			<u>Hours</u>	<u>Amount</u>
03/04/2015	JSL	Review signed McClure Lease Agreement and revise and circulate draft Park Restoration Termination Letter	0.30	90.00
03/09/2015	GTS	Review draft letter of termination for Park Restoration	0.30	115.50
	JSL	Draft/revise letter to Park Restoration to, among other things, incorporate damages claim	1.20	360.00
03/10/2015	JSL	Draft/revise and finalize Park Restoration termination letter	0.30	90.00
03/19/2015	GTS	Review and revise letter to Park Restoration re termination of agreements.	0.20	77.00
03/20/2015	YJK	Review and revise letter to Park Restoration re: hotel & beach termination and McClure home default	0.40	46.00
	GTS	Review and finalize letter to Park Restoration re termination of agreements.	0.20	77.00
	GTS	Draft email to Fran Murrman re courtesy copy of Park Restoration termination letter.	0.10	38.50
	GTS	Draft email to Mark Turner re timing of delivery of Park Restoration termination letter.	0.10	38.50
	GTS	Draft email to Larry B. and Mike K. re update on status of Park Restoration termination	0.10	38.50
03/27/2015	GTS	Review response re Park Restoration and forward same to Mark Turner and JSL	0.20	77.00
03/30/2015	JSL	Draft letter to Park Restoration in response to receipt of partial payments on two leases subject to termination letter	0.50	150.00
03/31/2015	JSL	Review/analyze Park Restoration response to termination letter and its exhibits, the Statement of Agreement, form of agreements, Municipal Payment Agreement, Security Agreement, and Irrevocable Power of Attorney	1.50	450.00
04/06/2015	YJK	Review and revise letter to Park Restoration re: partial payments	0.30	34.50
	GTS	Review and finalize reservation of rights letter for Park Restoration	0.20	77.00
04/07/2015	GTS	Review letter and attachments from Fran Murrman re Park Restoration agreements.	0.50	192.50
04/08/2015	JSL	Draft letter to Park Restoration replying to allegations contained in its response disputing termination of its agreements with the Debtor	1.50	450.00
04/09/2015	GTS	Review draft reply to Park Restoration	0.20	77.00
04/13/2015	JSL	Draft letter to Mizner law firm re: recent correspondence between the Debtor and Park Restoration related to their pending agreements	0.60	180.00
04/20/2015	JSL	Review/analyze correspondence from Park Restoration to the Board of Trustees	0.50	150.00
05/05/2015	GTS	Telephone call with Fran Murrman re update status of Park Restoration matters.	0.20	77.00

			Hours	Amount
05/18/2015	GTS	Review and reply to Fran Murrman re rejection of proposal from Greg Sutterlin	0.10	38.50
	GTS	Telephone call with John Mizner re status of Hotel management and coordination for call with Popoviches.	0.10	38.50
05/20/2015	GTS	Telephone call John Mizner, Mark Turner and Steve/Joyce Popvich re lease termination and transition	0.70	269.50
05/22/2015	GTS	Review and reply to messages re Park Restoration, status of hotel signs on highway and cease and desist request to Greg Sutterlin.	0.20	77.00
05/26/2015	GTS	Review status of Court Order from Judge Spataro re Park Restoration and review of status and strategy.	0.40	154.00
	GTS	Review form service agreement for possible use at Hotel.	0.20	77.00
	GTS	Review draft management agreement for hotel.	1.10	423.50
	GTS	Conference with JSL re review alternatives and strategy for hotel.	0.10	38.50
	JSL	Draft/revise standard management agreement for hotel operations	3.10	930.00
	JSL	Conference with J. Faulds re: research on authority of 50% member of LLC with no operating agreement to bind LLC to a contract with a third party	0.20	60.00
05/27/2015	GTS	Review draft agreement for management of hotel	0.50	192.50
	GTS	Telephone call with John Mizner re status of Poppovich interest in hotel and status of control over PR.	0.20	77.00
	GTS	Review and reply to email with Mark Turner, John Swick and JSL re status and strategy for operation of hotel and issues related to liquor license.	0.60	231.00
	GTS	Review email from John Mizner re status of PR and hotel; forward same to Mark Turner, John Swick and JSL.	0.10	38.50
05/28/2015	GTS	Draft outline for response to Judge Spataro re Park Restoration matters	0.40	154.00
05/29/2015	GTS	Draft letter to Judge Spataro re CLP status regarding Park Restoration	1.30	500.50
06/01/2015	GTS	Review, finalize and issue letter to Judge Spataro re CLP position of Park Restoration	0.20	77.00
06/22/2015	GTS	Review email and replies involving Greg Sutterlin and request for fireworks display.	0.30	115.50
	GTS	Review letter from Judge Spataro re impact of Park Restoration matters on CLP and review of strategy.	0.40	154.00
08/17/2015	JSL	Telephone calls from cottage owners and counsel to cottage owners re: outsales prior to 1997 deed transaction	0.50	150.00
For professional services rendered			42.80	\$13,875.00

	<u>Amount</u>
Balance due	<u><u>\$13,875.00</u></u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	13.70	385.00	\$5,274.50
Jeanne S. Lofgren	28.40	300.00	\$8,520.00
Yvonne J. Kocher	0.70	115.00	\$80.50

Stonecipher Law Firm

125 First Avenue
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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.06 - Conferences - Debtor
Invoice # 15344

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

			<u>Hours</u>	<u>Amount</u>
12/08/2014	GTS	Review list of open matters to discuss with Mark Turner	0.20	77.00
	JSL	Review/analyze materials sent from M. Turner related to Trustees of CLP history, 2007 recommendations, and 2014 reorganization plan	1.20	360.00
	GTS	Telephone call with Mark Turner re update on status of open issues in case.	0.80	308.00
	GTS	Conference with JSL re background documents on motion to assume Alliance agreement.	0.20	77.00
12/11/2014	GTS	Telephone call with Mark Turner re misc. issues for completion of motions, schedules and matter of strategy moving forward	0.60	231.00
12/17/2014	GTS	Telephone call with Mark Turner re update status of motions filed, call with US Trustee, funding status moving forward and financing alternatives.	0.50	192.50
	JSL	Conference with M. Turner re: status of schedules and statements and conference with U.S. Trustee	0.50	150.00
12/31/2014	RBR	Conference with GTS re: first day utilities motion issues and retention issues.	0.30	115.50
	GTS	Telephone call with Mark Turner re status of hearing next week, ad hoc committee request and status of utilities motion.	0.30	115.50
01/05/2015	GTS	Conference with Mark Turner, Cheryl and Jeanne L. re update case status; prepare for hearing tomorrow and strategy on next steps.	1.00	385.00
	JSL	Draft list of issues to discuss on conference call with debtor and management	0.60	180.00
	JSL	Conference with M. Turner re: January 6, 2015 hearings and case	1.00	300.00

			<u>Hours</u>	<u>Amount</u>
01/06/2015	RBR	Conference with GTS re: upcoming status conference, anticipated issues, and strategy generally.	0.40	154.00
01/07/2015	GTS	Review agenda for meeting tomorrow.	0.20	77.00
01/08/2015	GTS	Conference with Mark Turner, John Swick and Bill Bragg re status and strategy for open issue on case and plan development.	4.00	1,540.00
	GTS	Conference with Mark Turner, John Swick and Bill Bragg - travel to Meadville and return.	3.60	693.00
01/23/2015	GTS	Draft email to Mark Turner re format for Plan and Disclosure Statement; status of taxing authorities motion for relief from stay and issues related to schedules.	0.20	77.00
	GTS	Telephone call with Mark Turner re schedules, relief from stay motion, funding and governance issues.	0.60	231.00
01/29/2015	GTS	Draft email reply following review re status of processing lease assignment.	0.20	77.00
	GTS	Draft email to Mark Turner re possible removal of insurance claim matter.	0.10	38.50
02/02/2015	GTS	Draft email to Mark Turner re status of possible removal of insurance proceeding and review reply.	0.10	38.50
02/06/2015	GTS	Telephone call with Mark Turner re pending R/S motion; Jt. Municipal Authority request; status of funding and plan alternatives.	0.70	269.50
02/09/2015	GTS	Telephone call with Cheryl T. and JSL re open issues on monthly report.	0.50	192.50
02/17/2015	GTS	Draft email to Mark Turner re update on taxing bodies and need for further discussion.	0.20	77.00
02/18/2015	GTS	Telephone call with Mark Turner re status of financing, pending motions and update on case strategy	0.70	269.50
03/04/2015	GTS	Conference with Mark Turner, John Swick and JSL re update on status and strategy of various pending matters.	1.10	423.50
	JSL	Conference with debtor regarding various operational and bankruptcy-related matters	1.10	330.00
03/17/2015	GTS	Telephone call with Mark Turner re update on status of Bridgeway Capital; status of mediation stipulation and Park Restoration issues.	0.30	115.50
03/18/2015	GTS	Telephone call with Mark Turner re update on status of discussions with Bridgeway Capital	0.20	77.00
03/24/2015	GTS	Telephone call with Mark Turner re update on financing and discussion of letter from Bill Jordan.	0.30	115.50
03/25/2015	GTS	Draft email to Mark Turner re review of attorney general letter	0.10	38.50
04/06/2015	GTS	Conference call with Mark Turner, Cheryl Torrie and JSL re update on financing, response to Park Restoration, preparations for mediation, and issues raised by Larry Bolla this morning.	0.80	308.00

		Hours	Amount
04/06/2015	JSL Conference with M. Turner and G. Snyder re: outstanding CLP issues including status of DIP financing and proposed DIP term sheet, upcoming mediation and reply to Park Restoration	1.00	300.00
04/10/2015	JSL Email to C. Torrie re: no need for separate tax account and inability to retain proposed CPA	0.30	90.00
04/16/2015	GTS Telephone call with Mark Turner re update on mediation and review issues regarding National Fuel	0.30	115.50
04/21/2015	GTS Telephone call with Mark Turner re update on status of financing, park restoration, conversation with Larry Bolla and strategy on extension of exclusivity	0.40	154.00
04/28/2015	GTS Telephone call with Mark Turner re update on status of matters for hearing this morning.	0.30	115.50
	GTS Telephone call with Mark Turner re discussion of events at hearing and strategy to move forward.	0.60	231.00
05/04/2015	GTS Telephone call with Mark Turner re preparations for hearing tomorrow and status of financing	0.20	77.00
	GTS Telephone call with Mark Turner re status of DIP financing motion, exhibit of cash flow and related issues.	0.20	77.00
05/08/2015	GTS Conference with Mark T., JSL, and John Swick re review of taxing authority response and coordination for hearing on Monday.	0.50	192.50
	JSL Conference with Debtor and EPACC re: upcoming hearings and Taxing Authorities' supplemental objection to exclusivity	0.50	150.00
05/18/2015	GTS Telephone call with Mark Turner re status of hearing for tomorrow and related issues.	0.20	77.00
	GTS Telephone call with Mark Turner re issues and coordination of call with John Mizner and Popoviches	0.10	38.50
05/26/2015	GTS Telephone call with Mark Turner, John Swick and JSL re status and strategy regarding management of hotel.	0.80	308.00
	JSL Conference with M. Turner and J. Swick re: Park Restoration	0.80	240.00
06/08/2015	GTS Telephone call with Mark Turner re update on operations; status of financing; discussions with Greg Rubino and plan process.	0.20	77.00
06/22/2015	GTS Telephone call with Mark Turner re comments from Greg Sutterlin; status of listing agreement and retention of ordinary course professionals.	0.30	115.50
07/13/2015	GTS Conference with Mark Turner re status of operations and discussion of Disclosure Statement and Plan treatment of creditors.	1.10	423.50
07/28/2015	GTS Conference with Mark Turner and JSL re issues and open matters on Plan of Reorganization.	1.20	462.00
08/25/2015	GTS Telephone call with Mark Turner re status of objections to Disclosure Statement and related issues.	0.30	115.50

		<u>Hours</u>	<u>Amount</u>
08/28/2015	GTS Telephone call with Mark Turner re status of objections to Disclosure Statement and related plan issues.	0.50	192.50
08/31/2015	GTS Telephone call with Mark Turner re Plan and Disclosure Statement issues; review of marketing of lots.	1.00	385.00
	For professional services rendered	<u>33.40</u>	<u>\$11,571.00</u>
	Balance due		<u><u>\$11,571.00</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	22.10	385.00	\$8,508.50
George T. Snyder	3.60	192.50	\$693.00
Jeanne S. Lofgren	7.00	300.00	\$2,100.00
Ronald B. Roteman	0.70	385.00	\$269.50

Stonecipher Law Firm

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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.07 - Disclosure Statement
Invoice # 478

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
07/06/2015	JSL Draft/revise disclosure statement	3.00	900.00
07/07/2015	JSL Draft Disclosure Statement	8.80	2,640.00
07/08/2015	JSL Draft Disclosure Statement	8.00	2,400.00
	JSL Conference with G. Snyder re: Disclosure Statement and Plan	0.20	60.00
07/09/2015	JSL Draft Disclosure Statement	2.30	690.00
	GTS Review draft disclosure statement	0.70	269.50
07/10/2015	GTS Review Disclosure Statement for meeting with JSL	0.30	115.50
	GTS Conference with JSL re issues for Plan and Disclosure Statement; description of case and treatment of creditors.	1.00	385.00
	JSL Conference with G. Snyder re: disclosure statement	1.00	300.00
	JSL Revise disclosure statement and circulate to client for review and comment	3.00	900.00
07/13/2015	JSL Conference with G. Snyder re: disclosure statement	0.20	60.00
	JSL Conference with M. Turner re: disclosure statement	1.10	330.00
	JSL Draft/revise disclosure statement	1.50	450.00
07/14/2015	JSL Revise disclosure statement re: Classes 2 through 15	0.50	150.00
07/27/2015	JSL Revise disclosure statement re: Harris Claim, feasibility and to accord with Plan provisions	1.00	300.00

		Hours	Amount
07/28/2015	JSL Revise disclosure statement	2.20	660.00
07/29/2015	JSL Revise plan and draft overview of plan	3.10	930.00
	JSL Revise disclosure statement and draft preliminary statement	2.60	780.00
07/30/2015	GTS Review and revise Disc. Statement	0.40	154.00
	JSL Review draft disclosure statement	1.10	330.00
07/31/2015	JSL Revise, finalize and file Disclosure Statement	2.50	750.00
08/03/2015	YJK Review and revise Certificate of Service re: Disclosure Statement and Order and Notice for Hearing on Disclosure Statement; email to JL re: same	0.30	34.50
	YJK Service of Disclosure Statement on 20 largest and 2002 parties; service of Order and Notice for Hearing on Disclosure Statement of the Court's mailing matrix	1.70	195.50
	JSL Review Notice and Hearing on Disclosure Statement; calendar dates, coordinate service; prepare and file certificate of service regarding same	0.70	210.00
08/25/2015	GTS Review and download Objections to DS filed by Taxing Bodies, First Capital and Pa DEP	0.20	77.00
	GTS Review objections to DS and related strategy	0.90	346.50
	GTS Telephone call from Angela Erd at PA DEP re issues on objection to DS	0.20	77.00
	GTS Review status of objections to DS and Plan	0.20	77.00
08/26/2015	GTS Review and download objections to DS	0.20	77.00
	GTS Review objections to DS from Prischak and Joint Municipal authority	0.30	115.50
	GTS Telephone call with Larry Bolla re status of DS and Taxing authority objections	0.20	77.00
08/27/2015	GTS Review and summarize objections to DS from 4 major objections	1.00	385.00
	GTS Telephone call with John Swick re status of real estate sale as it relates to plan of reorganization and DS	0.30	115.50
	GTS Telephone call with Pete Acker re First Capital objections to DS	0.40	154.00
	GTS Review and summarize objections and outline for possible responses	1.20	462.00
08/28/2015	GTS Conference with JSL re status and strategy for resolution of objections to Disclosure Statement.	0.50	192.50
	GTS Review issues and strategy regarding DS objections	0.50	192.50
	JSL Conference with G. Snyder re: disclosure statement objections	0.50	150.00
08/31/2015	GTS Telephone call with John Kroto re discussion of Joint Authority Objections	0.30	115.50

		<u>Hours</u>	<u>Amount</u>
08/31/2015	GTS Telephone call with Nick Pagliari re discussion of Prischak DS objections	0.40	154.00
	GTS Review Plan and Disclosure Statement, review objections to DS, review strategy and alternatives for Plan and DS, review claim impairment requirements and outline of issues for hearing tomorrow.	4.80	1,848.00
	JSL Review revised projections omitting non-repeating cap ex and deferred maintenance expenditures	0.30	90.00
	JSL Conference with M. Turner re: disclosure statement objections and cash flow projections	1.10	330.00
	For professional services rendered	<u>60.70</u>	<u>\$19,030.00</u>
	Balance due		<u><u>\$19,030.00</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	14.00	385.00	\$5,390.00
Jeanne S. Lofgren	44.70	300.00	\$13,410.00
Yvonne J. Kocher	2.00	115.00	\$230.00

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.08 - Plan
Invoice # 286

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
02/04/2015	GTS Conference with JSL re plan outline and timing.	0.20	77.00
02/09/2015	JSL Review/analyze 2015 projected cash flow statement; email to G. Snyder re: same	1.50	450.00
03/04/2015	GTS Conference with JSL re outline of plan and timing for preparaion.	0.20	77.00
03/05/2015	GTS Review plan forms and consideration of issues for inclusion in Plan,	1.00	385.00
03/10/2015	GTS Conference with JSL re strategy regarding plan content and strategy	0.20	77.00
	JSL Conference with G. Snyder re: plan	0.20	60.00
03/11/2015	JSL Review/analyze email from P. Acker	0.30	90.00
03/13/2015	JSL Review/analyze Summit Township litigation and order re: 1998 fraudulent conveyance action	0.50	150.00
03/17/2015	GTS Review file re form motion to extend exclusivity	0.40	154.00
03/18/2015	JSL Draft/revise Motion to Extend Exclusivity for Plan and Solicitation	2.50	750.00
03/20/2015	GTS Review outline of possible plan	0.40	154.00
03/23/2015	JEF Draft claim bar date notices for parties requesting notice.	0.50	60.00
	GTS Review local rule re possible need for bridge order on extension of exclusivity.	0.20	77.00
	JSL Draft/revise motion to extend exclusivity periods	5.00	1,500.00
03/26/2015	GTS Review draft motion to extend time to file Plan	0.80	308.00

			<u>Hours</u>	<u>Amount</u>
03/27/2015	JSL	Revise Motion to Extend Exclusivity and circulate for client review and approval	0.50	150.00
03/31/2015	JSL	Revise, finalize and file Motion to Extend Exclusivity Periods	1.00	300.00
04/02/2015	JSL	Draft/revise and file Certificate of Service for Motion to Extend Exclusivity Date and Scheduling Order	1.00	300.00
04/06/2015	GTS	Review issues regarding classification of secured claims.	0.30	115.50
	JSL	Email to J. Faulds re: revising lien list into classification of secured claims	0.50	150.00
04/08/2015	JEF	Prepared a list of liens in order of priority.	1.40	168.00
	JSL	Review draft classification of secured claims	0.20	60.00
04/22/2015	GTS	Review Taxing Authorities objections to Debtor's extension of exclusivity and strategy for response.	0.40	154.00
	JSL	Review/analyze response to motion to extend exclusivity filed by the real estate taxing authorities	0.50	150.00
	JSL	Correspondence to/from the Debtor re: analysis of real estate taxing authorities' objection to extend exclusivity	0.60	180.00
04/28/2015	RBR	Conference with GTS re:plan strategy/process.	0.40	154.00
04/29/2015	JSL	Draft Certificate of Service for Order continuing hearing on Motion to Extend Exclusivity, coordinate service, and file the Certificate of Service	0.70	210.00
05/08/2015	JSL	Review/analyze and comment on Taxing Authorities' supplemental objection to motion to extend exclusivity period	1.00	300.00
05/11/2015	RBR	Conference with GTS re:exclusivity and DIP financing matters.	0.10	38.50
05/12/2015	JSL	Prepare and file certificate of service for order granting extension of exclusivity period	0.50	150.00
06/08/2015	GTS	Conference with JSL re status of plan classification process.	0.10	38.50
06/11/2015	GTS	Review plan classification issues and alternatives.	0.90	346.50
07/01/2015	JEF	Prepared disclosure statement for the plan of reorganization.	1.20	222.00
07/02/2015	JEF	Prepared disclosure statement and drafted an email summary to JSL.	5.80	1,073.00
07/08/2015	GTS	Conference with JSL re outline of plan treatment of creditors.	0.20	77.00
07/13/2015	GTS	Conference with JSL re classification and claim treatment issues.	0.20	77.00
07/14/2015	JSL	Draft plan of reorganization	5.30	1,590.00
07/15/2015	JSL	Draft Plan of Reorganization	2.00	600.00
07/17/2015	JSL	Draft plan of reorganization	4.50	1,350.00

			<u>Hours</u>	<u>Amount</u>
07/20/2015	JSL	Draft plan of reorganization	1.70	510.00
07/22/2015	GTS	Review and mark revisions to Plan	1.00	385.00
07/27/2015	GTS	Conference with JSL re open issues on plan and matters to be reviewed with Mark Turner	0.20	77.00
	JSL	Review/analyze first day declaration and scope of authority	0.40	120.00
	JSL	Conference with G. Snyder re: comments to Plan	0.20	60.00
	JSL	Revise plan to incorporate comments from G. Snyder and circulate to client for consideration	1.20	360.00
07/28/2015	GTS	Review revised plan in preparation for call with Mark Turner.	0.50	192.50
	JSL	Conference with G. Snyder and M. Turner re: plan provisions and board approval	1.30	390.00
	JSL	Email to M. Turner re: follow up items for finalizing plan and disclosure statement	0.50	150.00
	JSL	Revise plan	1.80	540.00
07/29/2015	GTS	Review status of revised financials for plan.	0.10	38.50
	GTS	Review revised description of means to implement plan and related plan provisions; review spreadsheets in support of plan.	1.60	616.00
	JSL	Review revised cash flow projections for 2015 through 2020	1.50	450.00
07/30/2015	GTS	Review revisions to Plan.	0.30	115.50
	JSL	Email to M. Turner re: cash flow projections	1.00	300.00
	JSL	Review draft plan	1.00	300.00
07/31/2015	GTS	Conference with JSL re updates and revisions to Plan and DS	0.20	77.00
	GTS	Review finalized plan and d/s as filed with Court	0.10	38.50
	JSL	Conference with G. Snyder re: plan and disclosure statement	0.20	60.00
	JSL	Review/analyze revised cash flow projections	1.20	360.00
	JSL	Revise, finalize and file Plan	2.50	750.00
08/21/2015	GTS	Review status of plan objection deadline and timeline for responses and initial hearing.	0.10	38.50
		For professional services rendered	61.80	\$18,251.50
		Balance due		<u><u>\$18,251.50</u></u>

Timekeeper Summary

Name	Hours	Rate	Amount
George T. Snyder	9.60	385.00	\$3,696.00
Jaclyn E. Faulds	7.00	185.00	\$1,295.00
Jaclyn E. Faulds	1.90	120.00	\$228.00
Jeanne S. Lofgren	42.80	300.00	\$12,840.00
Ronald B. Roteman	0.50	385.00	\$192.50

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.09 - Claim Matters
Invoice # 15345

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

			<u>Hours</u>	<u>Amount</u>
12/09/2014	GTS	Review correspondence from Flat Iron capital re insurance secured claim.	0.20	77.00
	GTS	Draft email to client re Flat Iron Capital claim and review response regarding status and procedure for renewal	0.10	38.50
	GTS	Review letter from Peter Acker re First Capital Finance claim and forward same to client for review.	0.10	38.50
12/10/2014	GTS	Review correspondence from Peter Acker and review status of possible order impacting real estate; draft email reply to Mr. Acker re service of papers and timing for change to matrix	0.20	77.00
12/11/2014	GTS	Telephone call from Tera Powell re status as possible claimant resulting from property ownership	0.20	77.00
12/12/2014	JSL	Calls from individuals stating they own their interests in the land and cottage in fee	0.30	90.00
12/23/2014	JSL	Correspondence from/to Penelec's counsel re: draft proof of claim and Section 366 Motion	0.30	90.00
01/19/2015	JSL	Review claim filed by Albert Guarnieri & Co	0.20	60.00
01/28/2015	JSL	Review/analyze proof of claim filed and schedule F	0.20	60.00
02/09/2015	JSL	Review Penelec third amended claim	0.20	60.00
02/24/2015	GTS	Telephone call Guy Fustine re status of claim of Jt. Municipal Authority and related matters.	0.40	154.00
	JSL	Review/analyze filed claims	0.20	60.00

			Hours	Amount
03/02/2015	GTS	Review letter from National Fuel re funding of deposit.	0.10	38.50
03/17/2015	JEF	Draft Notices of Claims Bar Date.	2.70	324.00
	JSL	Review Order for serving Claims Bar Date Notice re: requirements	0.30	90.00
	JSL	Draft/revise integrated form of Claims Bar Date Notice and complete sample for one secured creditor	0.70	210.00
	JSL	Conference with J. Faulds to coordinate completion of Claims Bar Date for each scheduled creditor and party requesting notices	0.30	90.00
03/18/2015	JEF	Draft Notices of Claims Bar Date.	1.90	228.00
03/19/2015	JEF	Draft claims bar date notices for parties requesting notices.	0.80	96.00
03/25/2015	JSL	Review Mercer County State Bank claim and send to client	0.20	60.00
03/30/2015	JSL	Review/revise and finalize Notices to creditors of the claims bar date	1.50	450.00
04/01/2015	JSL	Draft/revise Certificate of Service for Claims Bar Date, assemble service list attachments	1.00	300.00
04/06/2015	JSL	Revise and file Certificate of Service for Notice of Claims Bar Date	0.50	150.00
	JSL	Email to F. Murrman with courtesy copy of the Notice of Claims Bar Date	0.20	60.00
06/05/2015	YJK	Review claims register, proofs of claims, and scheduled claims and draft claims analysis; conference with JL re: same	2.60	299.00
06/08/2015	JSL	Review/analyze claims filed prior to bar date and coordinate reconciliation of filed claims against claims as scheduled	1.00	300.00
06/09/2015	GTS	Review spreadsheet of claims discrepancies from scheduled to filed POC's	0.20	77.00
	JSL	Review/analyze claims reconciliation chart; revise chart and circulate to client	1.00	300.00
06/12/2015	JSL	Review/analyze "proof of claim" served, but not filed, by G. Harris; discussion with GTS re: same	0.50	150.00
06/17/2015	GTS	Review Gary Harris Claim and Judge Deller Order re same.	0.20	77.00
	GTS	Review pleadings and state court orders re resolution of Gary Harris 99-year lease claim in 2003	0.50	192.50
	JSL	Emails regarding prior state court opinion voiding 99 year lease on Park property	0.30	90.00
07/16/2015	JEF	Researched whether post judgment interest continues to accrue once the judgment lapses. Read case law and called Lexis representative regarding search results and assistance.	4.80	888.00
07/21/2015	JSL	Review/analyze and circulate Harris Proof of Claim	0.50	150.00
08/03/2015	JSL	Calls and emails from/to counsel for Prischaks and M. Turner re: treatment of the Prischaks' claims	0.50	150.00

		<u>Hours</u>	<u>Amount</u>
08/05/2015	JEF Administration -calculated and entered hearing, response and filing deadline dates in excel.	0.20	37.00
08/07/2015	JSL Calls from multiple cottage lessees re: desire to purchase property	0.20	60.00
	For professional services rendered	<u>25.30</u>	<u>\$5,749.00</u>
	Balance due		<u><u>\$5,749.00</u></u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	2.20	385.00	\$847.00
Jaclyn E. Faulds	5.00	185.00	\$925.00
Jaclyn E. Faulds	5.40	120.00	\$648.00
Jeanne S. Lofgren	10.10	300.00	\$3,030.00
Yvonne J. Kocher	2.60	115.00	\$299.00

Stonecipher Law Firm

125 First Avenue
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Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.10 - Misc. Motions
Invoice # 15346

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
12/04/2014	JSL Draft/revise motion to extend time for filing schedules and statements	1.50	450.00
12/08/2014	JSL Draft/revise Motion for Order Finding Utility Providers Adequately Protected under Section 366 with payment of a 2-week postpetition security deposit	3.80	1,140.00
	JSL Review/analyze court scheduling procedures for motions to extend and expedited requests for relief	0.30	90.00
12/09/2014	GTS Review and revise Utilities Motion	0.70	269.50
	GTS Review status of initial motions to be filed.	0.10	38.50
	GTS Conference with JSL re update status of draft motions and initial case declaration.	0.20	77.00
	JSL Draft/revise Section 366 Motion and circulate to M. Turner	1.20	360.00
12/10/2014	GTS Review and download scheduling order on retention application; record hearing date and coordinate with JSL for service.	0.20	77.00
	JSL Attend to service of Order Scheduling Hearing on Retention Application; prepare certificate of service re: same; file certificate of service	0.80	240.00
	GTS Review and revise Motion to assume Alliance Management Services agreement.	1.10	423.50
12/11/2014	GTS Review updates to Utilities motion and exchange of comments with Mark Turner.	0.30	115.50
12/12/2014	GTS Conference with JSL re update on status of current motions in process and strategy for timing of filing and related matters.	0.40	154.00

			Hours	Amount
12/12/2014	JSL	Draft/revise Utility Motion with information provided by Alliance	1.10	330.00
	JSL	Review/analyze exhibits to Attorney General Preliminary Objections re: history of the Debtor's ownership and operations	3.00	900.00
12/15/2014	JSL	Draft/revise Declaration of W. Bragg in support of chapter 11 filing and expedited requests for relief, Motion re: Section 366 and Motion to Extend Time	5.30	1,590.00
	GTS	Telephone call with John Swick re status and strategy regarding timing and filing of motions for CLP	0.40	154.00
	GTS	Review draft utilities motion, extension to file Schedules and Sofa and draft Declaration.	0.50	192.50
12/16/2014	YJK	Review, revise, finalize, file and service of Motion to Extend Time to Complete the Bankruptcy Filing	0.70	80.50
	YJK	Review, revise, finalize, file and service of Expedited Motion for an Order Finding Utility Providers Adequately Assured; email to JL re: same.	0.70	80.50
	YJK	Review, revise, finalize and file Declaration of William L. Bragg in Support of Chapter 11 Filing and Requests for Relief.	0.60	69.00
	GTS	Review filing of Utilities Motion and extension of time motion.	0.10	38.50
	JSL	Attend to finalizing and coordinating filing and service of the Declaration, the Utility Motion, and the Motion for Time to Extend Deadlines for Schedules and Statements	1.10	330.00
12/17/2014	JSL	Review Orders scheduling hearings on Motion to Extend Time and Expedited Motion to Continue Utility Service and update deadlines	0.50	150.00
	JSL	Draft/revise certificates of service for Motion to Extend Time and Utility Motion and related Orders scheduling hearing dates; coordinate service of pleadings and file certificates of service	0.80	240.00
12/18/2014	YJK	Review and reply to email from JL re: Orders on Motion to Extend Time and Adequate Assurance Motion	0.10	11.50
12/22/2014	GTS	Review status of Utilities motion and response from Penelec	0.10	38.50
	JSL	Telephone call from Penelec's counsel re: Section 366 Motion	0.50	150.00
12/31/2014	JSL	Review/analyze U.S. Trustee's objection to retention application and request for ad hoc committee status by taxing authorities	0.50	150.00
	GTS	Review US Trustee Objection to attorney retention.	0.20	77.00
	GTS	Conference with RBR re status and strategy for first day hearings and overall case strategy.	0.30	115.50
	GTS	Conference with JSL re status of upcoming hearing and allocation of responsibilities.	0.20	77.00
	GTS	Telephone call with Heather Sprague re status retention motion and motion for ad hoc tax claimants committee	0.40	154.00

			<u>Hours</u>	<u>Amount</u>
12/31/2014	GTS	Review Disclosure of Ad Hoc Tax claimants committee and request for Court approval.	0.30	115.50
	GTS	Review background on pre-petition billing and payments; draft amended affidavit of counsel.	1.50	577.50
	GTS	Review and reply to email with Heather Sprague re revised affidavit of counsel.	0.10	38.50
01/05/2015	GTS	Review response of Ad Hoc Committee to Motion to extend time to complete schedules.	0.20	77.00
	GTS	Review and finalize affidavit; coordinate filing and service	0.10	38.50
	YJK	Finalize and file First Amended Affidavit of Stonecipher Law Firm; service of same on matrix.	0.80	92.00
	GTS	Telephone call with Heather Sprague re status for hearing tomorrow and timing on completion of schedules.	0.20	77.00
	GTS	Review and organize pleadings for hearing tomorrow on first day motions.	0.80	308.00
	JSL	Review/analyze request for ad hoc committee formation for real estate taxing authorities and its objection to motion to extend	1.00	300.00
	JSL	Preparation for hearings scheduled for January 6, 2015, including preliminary summary of assets and liabilities based upon information provided to date	1.70	510.00
01/06/2015	GTS	Review in preparation hearings today regarding Utility Motion, Retention of Stonecipher and Extension of Time to complete filings.	1.50	577.50
	GTS	Review and outline remarks in preparation for Status conference to be held with Court including review of summary of reorganization plan prepared by EPACC	1.50	577.50
	GTS	Court to attend initial hearings regarding retention, utility motion and extension of time to complete filing; court status conference.	1.40	539.00
01/07/2015	JSL	Draft/revise and file certificates of service for Orders granting retention application and utility motion, coordinate service of same	0.50	150.00
01/23/2015	GTS	Review scheduling and response deadlines on taxing authorities relief from stay motion.	0.30	115.50
	GTS	Review taxing bodies relief from stay motion.	0.30	115.50
	JSL	Review/analyze motion for relief filed by taxing authorities	0.40	120.00
01/26/2015	GTS	Telephone call from Larry Bolla and Mike K. re issues related to pending insurance matter.	0.40	154.00
01/27/2015	JSL	Conference with G. Snyder re: motion for relief and withdrawal of reference	0.20	60.00
02/02/2015	GTS	Review proposed Motion to remove the insurance litigation and limited relief from stay.	0.50	192.50

			<u>Hours</u>	<u>Amount</u>
02/02/2015	JSL	Draft/revise Objection to Taxing Authorities' Motion for Relief from Stay	4.20	1,260.00
02/04/2015	GTS	Review draft response to Tax body motion for relief from stay.	0.60	231.00
	GTS	Review letter from Guy Fustine re Joint Municipal claims and adequate protection and related issues.	0.30	115.50
	GTS	Review strategy regarding pending stay matters.	0.20	77.00
	JSL	Review/analyze Conneaut Lake Joint Municipal Authority request for adequate protection	0.70	210.00
	JSL	Email to Debtor re: analysis Conneaut Lake Joint Municipal Authority request for adequate protection	0.60	180.00
	JSL	Revise response to Taxing Authorities' Motion for Relief from Stay and circulate for review by client	0.80	240.00
02/05/2015	GTS	Review and reply to message from Guy Fustine re Joint Authority proposal.	0.10	38.50
02/06/2015	GTS	Telephone call from Mike K. re status of Larry Bolla participation by telephone and related issues for hearing next Friday.	0.20	77.00
	JSL	Revise Objection to Motion for Relief to incorporate client comments	0.30	90.00
02/09/2015	YJK	Draft Certificate of Service re: Objection to Motion to Condition Automatic Stay; finalize & file Motion & COS.	0.60	69.00
	GTS	Review final version of R/S objection to Taxing Bodies.	0.10	38.50
	JSL	Draft/revise Certificate of Service for Objection to Motion for Relief and coordinate filing and service	0.50	150.00
02/10/2015	GTS	Review status of upcoming hearings and legal issue for discussion on Friday.	0.20	77.00
02/17/2015	GTS	Review reply filed by Larry Bolla and taxing authorities; review strategy re hearing next week.	0.20	77.00
	JSL	Review/analyze RE Taxing Authority Reply to Debtor's Objection to Relief from Stay and Request for Adequate Protection	0.40	120.00
02/18/2015	GTS	Review response from Taxing Bodies and prepare for call with Mark Turner.	0.30	115.50
02/19/2015	GTS	Telephone call with Larry B. and Mike K. re update on insurance proceed adversary and review status of issues for hearing Tuesday.	0.60	231.00
02/20/2015	GTS	Conference with JSL re update on status of discussions with Larry B. and Mike K. re relief from stay matter for next Tuesday.	0.20	77.00
	JSL	Conference with G. Snyder re: R/E tax authority motion for relief hearing	0.20	60.00
02/23/2015	GTS	Conference with John Swick re update on pending motions and issues to be addressed in next few weeks	0.50	192.50
	GTS	Review in preparation for tax authorities relief from stay motion.	3.10	1,193.50

			Hours	Amount
02/24/2015	GTS	Review pleadings and bankruptcy code in preparation for hearing this morning on Taxing Authorities Motion for Relief from Stay.	1.40	539.00
	GTS	Court to attend hearing on Taxing Authority Motion for Relief from Stay.	1.30	500.50
	GTS	Conference with JSL re summary of hearing and next steps with Taxing Authorities.	0.30	115.50
	GTS	Telephone call with John Swick re summary of hearing and strategy for next steps.	0.40	154.00
02/26/2015	JSL	Review/analyze and comment on proposed stipulation by real estate taxing authorities relating to adequate protection motion	0.40	120.00
03/11/2015	GTS	Review and reply to email re process for amendment to Stipulation with taxing authorities per US Trustee change requested.	0.10	38.50
	JSL	Conference with counsel for Bridgeway Capital re: potential DIP financing	1.20	360.00
03/17/2015	JSL	Review Research and make additional inquiries into 327(e) and retention of Shafer Law Firm	2.80	840.00
	JSL	Email to G. Snyder re: 327(e) and retention of Shafer Law Firm	1.80	540.00
03/18/2015	JSL	Conference with G. Snyder re: status of potential dip financing and Shafer Law firm retention	0.20	60.00
04/01/2015	JSL	Review proposed DIP financing term sheet from Bridgeway Capital	0.30	90.00
04/10/2015	GTS	Review form application to retain accounting professional	0.20	77.00
	JSL	Draft Application to Retain CPA; review schedules and statements; email to C. Torrie confirming whether proposed CPA still remains on the Board of Trustees	3.50	1,050.00
	JSL	Research re: equitable considerations, disinterestedness, and employment of Debtor's accountant	1.00	300.00
04/21/2015	JSL	Draft/revise CPA Retention Application for Kreider & Company; prepare Affidavit for R. Kreider	1.20	360.00
04/22/2015	JSL	Revise Kreider Affidavit and coordinate filing of motion	0.30	90.00
04/23/2015	YJK	Review and revise Application to Retain Accountant, Notice of Hearing, and Certificate of Service; finalize, file and service of same	0.70	80.50
04/28/2015	GTS	Review pleadings, cases and statutory authority for hearing this morning on extension of exclusivity.	1.20	462.00
	GTS	Court to attend hearing on extension of exclusivity.	1.50	577.50
	GTS	Conference with JSL re results of hearing and strategy moving forward regarding exclusivity.	0.20	77.00
	GTS	Conference with RBR re status and strategy on exclusivity motion, financing and plan process.	0.40	154.00

			Hours	Amount
04/29/2015	GTS	Review hearing order on exclusivity motion and forward to Mark Turner	0.10	38.50
	GTS	Review spreadsheets from Mark Turner re financial details in potential response to Court inquiry	0.30	115.50
05/01/2015	RBR	Review document re:DIP financing terms, and confer with GTS re: motion.	0.20	77.00
	JSL	Draft motion for debtor-in-possession financing	5.70	1,710.00
05/02/2015	JSL	Review/revise DIP motion	0.50	150.00
05/04/2015	GTS	Review draft motion for financing	0.40	154.00
	GTS	Review proposed cash flow with financing; review revised motion for approval of financing and review timing for filing financing motion.	0.50	192.50
	GTS	Review revised Motion for DIP financing and proposed order.	0.20	77.00
	GTS	Review final revisions to financing motion; review status of hearing on financing and continuation of hearing regarding exclusivity.	0.40	154.00
	GTS	Draft email to Gene Herne, Mark Turner and John Swick re rescheduling of hearing for tomorrow; call to Mike K. re same.	0.20	77.00
	JSL	Draft/revise Motion for Interim Order Authorizing DIP Financing, review and assemble exhibits and finalize for filing	4.50	1,350.00
	JSL	Calls and email to/from M. Turner, J. Swick, G. Snyder, and E. Martin re: DIP Financing Motion and scheduling matters	1.20	360.00
	JSL	Review/analyze Northwest PA Planning Commission commitment letter	0.30	90.00
	JSL	Draft/revise and file Certificates of Service for DIP Motion and Scheduling Order and Order Canceling and Rescheduling Hearing on Exclusivity Motion	1.50	450.00
05/08/2015	GTS	Review taxing authority response to exclusivity and financing motion.	0.40	154.00
	GTS	Review and organize pleadings for hearing Monday.	0.40	154.00
05/09/2015	GTS	Review motions and responses in preparation for hearing on Monday.	0.60	231.00
05/11/2015	GTS	Review in preparation for hearing on motion to extend exclusivity and for interim financing.	1.20	462.00
	GTS	Court to attend hearings on extension of exclusivity and on initial hearing on DIP financing.	2.30	885.50
	GTS	Review revised orders on interim and for approval of final financing.	0.10	38.50
	JSL	Review alternate cash flow projection and circulate to L. Bolla	0.50	150.00
	JSL	Attend hearing on expedited request for authorization for interim DIP financing and continued hearing on motion to extend exclusivity period	2.00	600.00
	JSL	Draft modified order authorizing DIP finance and final order authorizing DIP finance with redlines; file same	1.60	480.00

			<u>Hours</u>	<u>Amount</u>
05/12/2015	JSL	Draft and file certificate of service for order authorizing interim DIP financing and setting a final hearing	0.50	150.00
05/13/2015	JSL	Draft/revise and file Certificate of No Objection for CPA Retention Application	0.40	120.00
05/18/2015	GTS	Telephone call with John Swick re status of hearing on final approving of DIP financing.	0.10	38.50
	GTS	Review docket re status of possible objections to DIP motion	0.10	38.50
05/19/2015	GTS	Review in preparation for Final hearing on DIP financing.	0.80	308.00
	GTS	Court to attend hearing on DIP financing approval.	1.20	462.00
05/20/2015	JSL	Draft certificate of service for final order authorizing DIP Finance, coordinate service and file certificate	0.70	210.00
06/09/2015	GTS	Telephone call with Hank Gent re clarification on lien rights granted to lenders in DIP financing order and process for closing.	0.20	77.00
	GTS	Review and reply to message from John Swick re clarification for Hank Gent on Northwest Commission loan matters.	0.10	38.50
06/17/2015	GTS	Review proposed engagement letter for special counsel regarding Shafer Law Firm.	0.20	77.00
	JSL	Review/comment on Swick retention agreement	0.30	90.00
06/23/2015	GTS	Review information for insurance financing motion and forward to Jeanne L.	0.10	38.50
06/24/2015	GTS	Review insurance motion and forward to JSL	0.10	38.50
06/25/2015	JSL	Conference with premium financing company and debtor re: issues related to premium financing motion	0.50	150.00
06/26/2015	YJK	Conference with JL re service of Expedited Motion to Enter Into an Insurance Premium with Flatiron; conference with CS re: same	0.30	34.50
	JSL	Revise expedited motion for authority to enter into insurance premium financing agreement with Flatiron and circulate for review and comment	1.80	540.00
	JSL	Revise/finalize expedited motion authorizing insurance premium financing and file with the court; call to Judge Deller's courtroom deputy re: same	0.80	240.00
	JSL	Review Order of Court scheduling expedited hearing on the motion for authority to enter into insurance premium financing agreement and coordinate servicing of same with the motion; prepare and file a certificate of service	0.70	210.00
06/30/2015	JSL	Conference with R. Clayton re: retention of his firm for tax returns	0.20	60.00
	JSL	Draft retention applications for tax accountant, real estate attorney, real estate agent, and engineer	1.50	450.00
07/01/2015	JSL	Draft retention application for Passport Realty as real estate broker and review and revise brokerage agreement	2.90	870.00

			<u>Hours</u>	<u>Amount</u>
07/01/2015	JSL	Email to G. Rubino re: retention application for Passport Realty and Affidavit in support	0.30	90.00
	JSL	Draft retention application for Shafer Law Firm for real estate matters	2.40	720.00
07/06/2015	GTS	Conference with JSL re status of retention of broker and special counsel.	0.20	77.00
	YJK	Finalize, file and service of Application to Retain Passport Realty, LLC as Real Estate Broker and Notice of Hearing	0.80	92.00
	GTS	Review retention application for John Swick and Shafer Law firm	0.30	115.50
	JSL	Draft/revise retention application for Shafer Law Firm	3.70	1,110.00
	JSL	Email to J. Swick re: retention application	0.50	150.00
	JSL	Revise and finalize Passport Realty retention application and coordinate filing of same	0.70	210.00
07/07/2015	JSL	Prepare for hearing on expedited motion for authority to enter into premium financing agreement	0.60	180.00
	JSL	Attend hearing on expedited motion for authority to enter into premium financing agreement	1.20	360.00
	JSL	Email to premium finance company circulating modified order granting motion for authority to enter into premium financing company; emails from/to insurer and U.S. Trustee's Office circulating proof of insurance coverage	0.70	210.00
07/09/2015	JSL	Revise application to retain Shafer Law Firm	0.40	120.00
07/10/2015	YJK	Review and revise Application to Retain Shafer Law Firm, Notice of Hearing and Certificate of Service; finalize, file and service of same	0.80	92.00
07/14/2015	YJK	Conference with JL re: Trustee request for Shafer Law Firm to file a Rule 2016 Affidavit; review rules and obtain form and email to JL re: same	0.30	34.50
	GTS	Telephone call with Larry Bolla re retention of Shafer Law Firm	0.20	77.00
	GTS	Telephone call with Heather Sprague re issues concerning Shafer Law Firm retention	0.50	192.50
07/15/2015	GTS	Telephone call with John Swick re form 2016 compliance issues	0.20	77.00
	JSL	Draft 2016(b) Statement for Shafer Law Firm	1.00	300.00
07/16/2015	YJK	Review email from JL re: Shafer 2016(b) Disclosure; file same	0.30	34.50
07/27/2015	JSL	Draft and file CNO for Passport Realty Retention Application	0.30	90.00
07/29/2015	JSL	Draft and file CNO for Shafer Law Firm retention	0.20	60.00
	JSL	Emails to G. Rubino of Passport Realty and J. Swick of Shafer Law Firm re: CNOs for retention applications	0.20	60.00
08/03/2015	YJK	Service of Order of Court re: Application to Employ Passport Realty on all parties listed on the Court mailing matrix	1.40	161.00

		<u>Hours</u>	<u>Amount</u>
08/03/2015	YJK Service of Order of Court re: Application to Employ Shafer Law Firm on all parties listed on the Court mailing matrix	1.40	161.00
	JSL Review Modified Orders granting employment applications for Shafer Law Firm and Passport Realty; prepare certificates of service and file same	0.50	150.00
08/31/2015	JSL Review proposed retention agreement with Porter Engineering; email to M. Turner re: same	0.20	60.00
	For professional services rendered	134.60	\$41,980.00
	Balance due		<u>\$41,980.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	39.30	385.00	\$15,130.50
Jeanne S. Lofgren	85.60	300.00	\$25,680.00
Ronald B. Roteman	0.20	385.00	\$77.00
Yvonne J. Kocher	9.50	115.00	\$1,092.50

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.11 - Miscellaneous AP's
Invoice # 287

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
01/30/2015	JSL Review/analyze and comment on proposed removal papers for beach club insurance litigation	1.00	300.00
02/03/2015	JSL Review/analyze state court litigation against G. Sutterlin and Park Restoration	0.30	90.00
02/11/2015	JSL Preparation for status conference on removal of insurance litigation and consent motion for relief from stay	1.10	330.00
02/12/2015	GTS Review Park Restoration consent in insurance proceeds adversary	0.10	38.50
02/13/2015	GTS Conference with JSL re preparations for hearing this morning.	0.20	77.00
	JSL Review/analyze responses to Consent Motion for Relief and Removal of Insurance Litigation filed by Park Restoration, LLC and the Conneaut Lake Joint Municipal Authority	0.90	270.00
	JSL Attend status conference on removal of the insurance litigation and hearing on consent motion for relief	1.00	300.00
02/17/2015	YJK Review email from JL re: Park Restoration adversary proceeding; review docket re: attorneys of record; email to JL & GTS re: same	0.20	23.00
	JSL Telephone call to M. Kruszewski re: consent to removal	0.20	60.00
02/20/2015	GTS Draft email to Guy Gustine re status of Jt. Municipal Authority joinder in insurance proceeds matter	0.20	77.00
	GTS Review email from Larry Bolla re follow up on status of Jt. Municipal Authority Joinder.	0.10	38.50
02/27/2015	JSL Review/revise motion to transfer interpleader funds from state court to bankruptcy court	1.00	300.00

			Hours	Amount
02/27/2015	GTS	Review and reply to email from Mike K. and Larry Bolla re schedule for conference call on mediation; and draft responsive email confirming date and time.	0.20	77.00
03/02/2015	GTS	Conference with Larry B, Mike K. and Fran M. re proposed stipulation for reference to mediation.	0.40	154.00
	GTS	Review proposed Stipulation regarding mediation	0.10	38.50
	GTS	Review and coordinate with Mike K. and JSL re revisions to motion to transfer funds to bankruptcy court.	0.10	38.50
	JSL	Review mediation stipulation	0.20	60.00
03/03/2015	JSL	Emails to/from M. Kruszewski re: motion to transfer interpleader funds	0.20	60.00
	GTS	Telephone call from Larry Bolla and Mike K. re status of mediation proposal and response from Fran Murrman	0.20	77.00
	GTS	Review Fran Murrman letter re mediation	0.10	38.50
	JSL	Review letter re: mediation and release of insurance proceeds from Park Restoration	0.20	60.00
03/04/2015	GTS	Review status of mediation proposal and alternatives in light of rejection from Park Restoration	0.20	77.00
	GTS	Telephone call with Mike K. re status and strategy regarding Park Restoration.	0.20	77.00
	GTS	Review status of mediation with potential mediator.	0.10	38.50
03/05/2015	GTS	Telephone call Mike K. and Fran Murrman re status of mediation proposal.	0.20	77.00
	GTS	Telephone call from Mike K. re proposed modifications to Stipulation from Fran M.	0.20	77.00
03/06/2015	GTS	Telephone call with Mike K. re update on status of negotiations with Fran Murrman on stipulation	0.10	38.50
03/12/2015	GTS	Telephone call to Mike Kruszewski re status of mediation stipulation	0.20	77.00
	GTS	Draft email to Mark Turner re update on status of mediation and related issues with Park Restoration	0.20	77.00
03/17/2015	GTS	Review status of stipulation for mediation of insurance proceeds dispute and timing on moving the funds to the bankruptcy court.	0.30	115.50
	JSL	Email to/from M. Kruszewski re: status of motion to transfer interpleader funds	0.20	60.00
03/18/2015	GTS	Review email from Norm Gilkey re status of mediation stipulation and review and reply to possible mediation dates.	0.20	77.00
03/19/2015	GTS	Review docket re status of mediation stipulation; review reason Debtor's counsel is not receiving ecf notices in adversary.	0.20	77.00

		Hours	Amount
03/19/2015	YJK Review email from JL and draft Notices of Appearance re: Erie adversary proceeding	0.40	46.00
	GTS Review order approving of mediation and reply to email regarding coordination of dates.	0.10	38.50
03/25/2015	GTS Draft reply email to Mike K. and Larry B. re status of motion to pay insurance proceeds to bankruptcy court.	0.10	38.50
	GTS Draft email to Fran Murrman re request for consent to motion pay money into bankruptcy court registry.	0.20	77.00
03/30/2015	YJK Review Motion re: Transfer of Funds and confer with JL re: Judge Deller's self scheduling	0.20	23.00
	JSL Revise Consent Motion for Transfer of Interpleader Funds re: removal of Erie Insurance Exchange from caption; prepare notice of hearing and certificate of service; file and coordinate service of same	2.00	600.00
04/06/2015	JSL Draft insurance litigation mediation statement	2.00	600.00
	JSL Conference call with L. Bolla re: upcoming mediation	0.20	60.00
04/07/2015	JSL Draft/revise mediation statement for insurance litigation	7.20	2,160.00
04/09/2015	GTS Review and revise confidential mediation statement for Mediator	0.40	154.00
	GTS Draft email to Mark Turner re review of mediation statement	0.10	38.50
04/10/2015	GTS Review and coordinate completion of mediation statement and related attachments.	0.10	38.50
	YJK Review and revise Mediation Statement; email to GTS re: same	0.70	80.50
	GTS Review and finalize mediation statement	0.30	115.50
04/11/2015	GTS Telephone call with Norm Gilkey re update on status of mediation and potential involvement of an additional party.	0.10	38.50
04/12/2015	GTS Telephone call with Norm Gilkey re update on discussions with possible additional party for mediation and need to join by telephone	0.10	38.50
04/13/2015	GTS Telephone calls with Norm Gilkey (2) and Larry Bolla re update on status of mediation for Wednesday and coordination with counsel to Steve Popovich	0.40	154.00
	GTS Telephone call with Mark Turner re status of mediation and request for our consent to allow Mr. Popovich to participate by telephone.	0.10	38.50
04/14/2015	GTS Review for mediation for tomorrow; coordinate creation of pleading binder for mediation	0.20	77.00
	GTS Telephone call Norm Gilkey re background for mediation matter	0.40	154.00
04/15/2015	GTS Review pleadings and background in preparation for Insurance Proceeds mediation	0.40	154.00

			<u>Hours</u>	<u>Amount</u>
04/15/2015	GTS	Conference with Mark Turner, Larry Bolla et al for mediation on disputed claim to insurance proceeds.	6.40	2,464.00
04/16/2015	GTS	Telephone call with Norm Gilkey re post-mediation debrief and possible alternatives for resolution.	0.50	192.50
	GTS	Telephone call with John Swick re Park Restoration legal arguments and related matters.	0.60	231.00
04/20/2015	GTS	Conference with JSL re update on status and outcome of mediation and related matters.	0.20	77.00
	GTS	Telephone call with Larry Bolla re update on status of tax claimants following mediation	0.20	77.00
	GTS	Telephone call with Norm Gilkey re status and strategy re possible negotiations	0.20	77.00
	JSL	Conference with G. Snyder re: debriefing on mediation	0.50	150.00
	JSL	Draft and file Certificate of No Objection re: Consent Motion Directing Transfer of Interpleader Funds	0.70	210.00
04/21/2015	GTS	Review alternatives for solution to insurance proceeds dispute and draft email to Attorneys Mizner and Murrman re further discussions	0.20	77.00
	GTS	Telephone call with John Mizner re discussion of legal issues and possible settlement.	0.30	115.50
04/22/2015	GTS	Review petition for receiver in Park Restoration litigation	0.30	115.50
04/24/2015	GTS	Review, reply and forward email relating to conference call with John Mizner and Mr. and Mrs. Popovich to discuss possible resolution of Park Restoration matters.	0.20	77.00
	GTS	Telephone call John Mizner, Joyce and Steve Popovich and Mark Turner re Park Restoration related matters.	1.20	462.00
04/27/2015	GTS	Conference with JSL re update on status of negotiations on Friday regarding Park Restoration and possible agreement moving forward.	0.20	77.00
	GTS	Telephone call with Larry Bolla re follow to discussion with John Mizner re possible resolution of insurance proceeds dispute	0.20	77.00
	JSL	Coordinate confirmation that interpleader funds are being transferred	0.30	90.00
05/01/2015	JSL	Review/analyze motion for summary judgment filed by taxing authorities	0.80	240.00
	JSL	Email to G. Snyder and M. Turner re: analysis of taxing authorities motion for summary judgment in the insurance litigation	0.50	150.00
05/04/2015	JSL	Review Order scheduling hearing and response deadline on Motion for Summary Judgment in the insurance litigation and calendar dates	0.20	60.00
05/08/2015	JSL	Review and comment on G. Sutterlin letter to Trustees	0.30	90.00

			Hours	Amount
05/18/2015	GTS	Review state court pleadings and taxing authority motion for summary judgment; review Park Restoration Motion for summary Judgment.	2.50	962.50
	JSL	Review Response to Motion for Summary Judgment filed by Park Restoration, Cross Motion for Summary Judgment filed by Park Restoration and Brief in Support	1.00	300.00
05/19/2015	GTS	Review pleadings re insurance litigation.	0.40	154.00
	GTS	Review Park Restoration pleadings in Insurance Adversary Proceeding	1.60	616.00
	JSL	Research re: insurance coverage issues and 40 P.S. 638	5.10	1,530.00
05/20/2015	GTS	Conference with JSL re update on status and strategy for response to Insurance Summary Judgment pleadings.	0.30	115.50
	GTS	Telephone call with Larry Bolla re status of response to Park Restoration pleadings.	0.30	115.50
	GTS	Review briefs from taxing authorities and Park Restoration re summary judgment on insurance proceeds.	3.20	1,232.00
	JSL	Review recent pleadings filed insurance coverage adversary proceeding and email to client advising of same	1.00	300.00
	JSL	Research insurance coverage issues and 40 P.S. 638	2.50	750.00
	JSL	Draft response / joinder in Taxing Authorities' Motion for Summary Judgment in the insurance litigation proceeding	1.90	570.00
05/26/2015	JSL	Revise/finalize Joinder of Debtor in Taxing Authorities' Motion for Summary Judgment; prepare certificate of service; file Joinder and coordinate service	0.80	240.00
05/27/2015	JSL	Research cases citing tax statute at issue in insurance litigation proceeding	0.50	150.00
05/29/2015	JSL	Draft/revise response to Park Restoration Motion for Summary Judgment and brief in opposition thereto	7.90	2,370.00
05/30/2015	JSL	Draft/revise Response to Park Restoration Motion for Summary Judgment and Brief in Opposition	3.20	960.00
05/31/2015	GTS	Review draft reply brief on Summary Judgement matters in insurance litigation.	0.50	192.50
06/01/2015	GTS	Review revised draft response to Park Restoration brief and coordinate for hearing tomorrow.	0.20	77.00
	JEF	Researched court's interpretations of the word or phrase "associated" or "associated with." Highlighted, saved and emailed findings.	0.90	166.50
	JEF	Reviewed Debtor's response to Park Restoration's motion for summary judgment and brief in opposition.	0.80	148.00
	GTS	Review Taxing Authorities brief and response re Park Restoration Summary Judgment motion	0.40	154.00

			Hours	Amount
06/01/2015	JSL	Draft/revise and finalize Response to Park Restoration Motion for Summary Judgment and Debtor's Brief in Opposition; assemble exhibits; file and coordinate service	4.00	1,200.00
	JSL	Review/analyze Taxing Authorities' response to Park Restoration Motion for Summary Judgment and Brief in Opposition	2.00	600.00
06/02/2015	GTS	Conference with JSL re preparations for argument on summary judgement motions	0.10	38.50
	GTS	Telephone call from Mike K. re late filed affidavit and attachments submitted by Park Restoration	0.10	38.50
	GTS	Review affidavit and attachments from Park Restoration; email to Jeanne L. at hearing regarding late filing.	0.10	38.50
	JSL	Preparation for hearing on cross motions for summary judgment	2.50	750.00
	JSL	Attend hearing on cross motions for summary judgment	2.20	660.00
	JSL	Email to client re: hearing on cross motions for summary judgment	0.50	150.00
	GTS	Review summary of hearing from JSL and review strategy on insurance proceeds.	0.10	38.50
06/05/2015	GTS	Telephone call from Larry Bolla re status of argument; certification of constitutional issue and related matters.	0.20	77.00
06/09/2015	JSL	Conference with J. Mizner and F. Murrman re: Park Restoration Adversary; email to GTS re: same	0.50	150.00
06/10/2015	GTS	Telephone call with Larry Bolla re status of recent proposal from Park Restoration and related issues.	0.20	77.00
	GTS	Review proposal from Fran Murrman and forward to Mark Turner	0.20	77.00
	GTS	Review and reply to Larry Bolla re Park Restoration proposal	0.10	38.50
06/11/2015	GTS	Review and reply to responses to Park Restoration proposal.	0.20	77.00
	GTS	Telephone call with Fran Murrman re status of settlement proposal and possible alternative solutions.	0.40	154.00
06/12/2015	GTS	Review status of certification order from John Mizner.	0.10	38.50
	GTS	Review and reply to Larry Bolla re rejection of Park Restoration proposal.	0.20	77.00
06/15/2015	JSL	Review/analyze and revise proposed certification of constitutional issue prepared by counsel to Park Restoration	0.50	150.00
	JSL	Email counsel to Erie Insurance Exchange requesting a copy of the full insurance policy	0.30	90.00
06/22/2015	JEF	Researched agency law in Pennsylvania in the context of manager managed entities.	1.50	277.50

			Hours	Amount
06/22/2015	GTS	Review Park Restoration supplemental submission on insurance policy and brief regarding interpretation of policy.	1.00	385.00
	GTS	Draft email to Fran Murrman re request to limit communications from Greg Sutterlin and to object to comments made to Mark Turner.	0.20	77.00
	JSL	Review/analyze insurance policy filed in insurance litigation proceeding and reply brief filed by Park Restoration	1.50	450.00
	JSL	Email to M. Turner re: analysis of reply brief, the insurance policy, and missing declaration pages	0.60	180.00
	JSL	Email to Park Restoration's counsel and to Erie Insurance Counsel re: missing declaration pages to the insurance policy	0.30	90.00
06/23/2015	JSL	Review, calendar and circulate Orders of Court scheduling a continued hearing on the Cross Motions for Summary Judgment in the insurance litigation and certifying the constitutional question to the Pennsylvania Attorney General	0.30	90.00
06/24/2015	JEF	Researched agency law principles in Pennsylvania.	1.70	314.50
06/30/2015	JEF	Researched Agency law principles in Pennsylvania.	1.20	222.00
	JSL	Review/analyze the renewal certificate and supplemental declaration pages provided by F. Murrman	0.80	240.00
07/06/2015	RBR	Review Order from Judge Spataro re Park Restoration civil matter; draft email to Mark Turner re same.	0.10	38.50
	GTS	Telephone call with Larry Bolla re status of Insurance declarations and interest in filing Joint Sur Reply	0.20	77.00
	GTS	Conference with JSL re strategy on Joint Sur Reply re insurance issues.	0.10	38.50
07/07/2015	GTS	Review strategy re claims against Park Restoration and possible separate adversary proceeding	0.20	77.00
07/10/2015	JSL	Review/analyze and circulate Taxing Authorities' Sur-Reply Brief in Opposition to Park Restoration Motion for Summary Judgment in Insurance Litigation	0.50	150.00
07/21/2015	GTS	Review brief from Pa Attorney General.	0.40	154.00
	JSL	Review/analyze Attorney General's response to Park Restoration's constitutional challenge regarding 43 P.S. Section 638	1.00	300.00
07/22/2015	JSL	Draft Joinder in and Supplement to: (A) Sur-Reply filed by the Taxing Authorities; and (B) AG Response based upon review and application of the Policy terms	6.60	1,980.00
07/23/2015	GTS	Review joinder to Atty General submission on insurance proceeds matter	0.30	115.50
	YJK	Review and revise Debtor's Joinder in and Supplement to (A) Sur-Reply filed by the Taxing Authorities; and (B) Response of the Attorney General of Pennsylvania to the Court's Certification Order of June 22, 2015, Issued Pursuant to 28 U.S.C. §2403; email to JSL & GTS re: same	0.50	57.50

		Hours	Amount
07/23/2015	YJK Finalize, file and service of Debtor's Joinder in and Supplement to (A) Sur-Reply filed by the Taxing Authorities; and (B) Response of the Attorney General of Pennsylvania to the Court's Certification Order of June 22, 2015, Issued Pursuant to 28 U.S.C. §2403	0.40	46.00
08/25/2015	GTS Conference with JSL re outcome of hearing on Insurance matters.	0.20	77.00
	JSL Review/analyze Reply filed by Park Restoration to Attorney General's Brief	0.50	150.00
	JSL Prepare for (1.5) and attend continued hearing on cross motions for summary judgment regarding the insurance proceeds (2.5)	4.00	1,200.00
	JSL Conference with G. Snyder re: continued hearing on cross-motions for summary judgment	0.20	60.00
	For professional services rendered	113.80	\$35,680.50
	Balance due		\$35,680.50

Timekeeper Summary

Name	Hours	Rate	Amount
George T. Snyder	31.50	385.00	\$12,127.50
Jaclyn E. Faulds	6.10	185.00	\$1,128.50
Jeanne S. Lofgren	73.70	300.00	\$22,110.00
Ronald B. Roteman	0.10	385.00	\$38.50
Yvonne J. Kocher	2.40	115.00	\$276.00

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.12 - Sale of Assets
Invoice # 288

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		<u>Hours</u>	<u>Amount</u>
01/13/2015	JSL Coordinate research re: land held for a charitable purpose	0.50	150.00
01/20/2015	CLR Research how to terminate a public/charitable trust of its nonprofit status such that real property assets could be sold for-profit.	4.00	200.00
01/22/2015	GTS Conference with Cate Rassman re background on research for possible sale of land subject to restriction.	0.50	192.50
	CLR Research how to terminate a public/charitable trust of its nonprofit status such that real property assets could be sold for-profit.	1.40	70.00
02/03/2015	CLR Research re: how to terminate a public/charitable trust of its nonprofit status such that real property assets could be sold for-profit	1.00	50.00
02/05/2015	CLR Research re: how to terminate a public/charitable trust of its nonprofit status such that real property assets could be sold for-profit	3.00	150.00
02/10/2015	CLR Research re: how to terminate a public/charitable trust of its nonprofit status such that real property assets could be sold for-profit	5.00	250.00
02/13/2015	GTS Review research re limits on avoidance to public purpose restrictions	0.30	115.50
02/18/2015	JSL Review/analyze research re: divesting charitable purpose; email to G. Snyder re: same	1.40	420.00
03/02/2015	GTS Review research re authority to sell property free of charitable purpose and court in which sale may be brought.	2.00	770.00
03/03/2015	GTS Review authority re treatment of deed restrictions and possible court for hearing the matter.	0.70	269.50
03/06/2015	JSL Review and research re: 363(d)(1), 363(f), 541(f) and 1129(a)(16)	4.00	1,200.00

			Hours	Amount
03/09/2015	GTS	Draft email to Larry Bolla, Mike K., Peter Acker and Heather Sprague re map of proposed parcel sales.	0.10	38.50
	JSL	Draft/revise letter to AG re: status of reorganization and chapter 11 plan	5.80	1,740.00
03/10/2015	JSL	Draft/revise letter to Attorney General re: status of reorganization, key components of plan and legal authority in support of same	4.30	1,290.00
03/11/2015	GTS	Review email from Peter Acker and review 1998 default judgment and motion from Peter Acker.	0.90	346.50
	JSL	Finalize draft letter to Attorney General re: status of reorganization, key components of plan and legal authorities in support of same	2.40	720.00
03/16/2015	GTS	Review draft letter to attorney general re possible sale of property	0.80	308.00
03/20/2015	GTS	Review possible issues with Attorney General re possible sale of land.	0.40	154.00
03/24/2015	YJK	Review and revise letter to Office of Attorney General re: sale of noncore parcels; email to GTS re: same	0.70	80.50
	GTS	Telephone call with Gene Herne re case update and possible sale of property	0.20	77.00
	GTS	Review and revise letter to Gene Herne re request for authorization to sell parcels free of trust restriction	2.30	885.50
	JSL	Revise letter to Attorney General	0.50	150.00
03/25/2015	GTS	Review and reply to message from Mark Turner re AG letter.	0.10	38.50
	JSL	Review and comment on revised letter to Attorney General re: intent to sell NonCore Parcels	0.50	150.00
03/26/2015	YJK	Finalize letter to Attorney General re: sale of assets	0.20	23.00
	GTS	Review and finalize letter to Gene Herne	0.10	38.50
04/09/2015	GTS	Telephone call with Steve Emery of Chicago Title re deed restriction issues	0.20	77.00
04/22/2015	GTS	Telephone call with Gene Herne re status of Attorney General review of proposal; schedule time for follow up conversation	0.20	77.00
04/23/2015	GTS	Review and reply to message from Gene Herne re property to be sold and coordinate response with Mark Turner.	0.20	77.00
	GTS	Telephone call with Gene Herne re discussion of authority to sell property.	0.30	115.50
	GTS	Review parcels to be sold and related selling parcels over time.	0.20	77.00
06/09/2015	GTS	Review status of Greg Rubino as possible realtor; review strategy for sale of CLP property	0.40	154.00
	GTS	Telephone call with Greg Rubino re introduction and review of sale process and retention	0.30	115.50

			<u>Hours</u>	<u>Amount</u>
06/10/2015	GTS	Draft email to Larry Bolla re status of potential property sale.	0.10	38.50
06/15/2015	GTS	Review proposed realtor listing agreement.	0.20	77.00
	GTS	Review and reply to email from John Swick re issues related to title and real estate to be done as part of sale process.	0.20	77.00
06/16/2015	RBR	Miscellaneous - review documents re: real estate broker/sale matters.	0.20	77.00
	GTS	Conference with RBR re status and strategy on sale of realty and retention of broker.	0.20	77.00
	GTS	Review proposed broker retention agreement; review form agreements from prior matters re key provisions and terms and draft email to Mark Turner re approval of retention agreement.	1.10	423.50
06/19/2015	GTS	Review real estate description for broker agreement and motion to appoint broker.	0.30	115.50
06/22/2015	GTS	Review email and attachment re description of property for listing agreement.	0.10	38.50
08/31/2015	GTS	Telephone call with John Swick re update on status and strategy for marketing and sale of property.	0.70	269.50
		For professional services rendered	48.00	\$11,764.00
		Balance due		\$11,764.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Catherine L. Rassman	14.40	50.00	\$720.00
George T. Snyder	13.10	385.00	\$5,043.50
Jeanne S. Lofgren	19.40	300.00	\$5,820.00
Ronald B. Roteman	0.20	385.00	\$77.00
Yvonne J. Kocher	0.90	115.00	\$103.50

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.13 - Tax Matters
Invoice # 289

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		Hours	Amount
03/02/2015	GTS Review notice from IRS re status of tax returns.	0.10	38.50
03/03/2015	GTS Conference with JSL re IRS inquiry letter and process for follow-up.	0.10	38.50
	JSL Review/analyze letter from IRS re: unfiled tax returns and conference with C. Torrie re: resolving same	0.50	150.00
04/06/2015	GTS Telephone call L. Bolla and JSL re status of matters for mediation, claims matters and discussion of contact with AG re charitable trust matters.	0.30	115.50
	GTS Draft email to Larry Bolla re follow up to call regarding Attorney General negotiations.	0.10	38.50
04/10/2015	JSL Conference with and email to U.S. Trustee's Office re: seasonal employment of individuals and whether tax account necessary	0.30	90.00
04/22/2015	JSL Correspondence with debtor re: tax collection notices received from Crawford County and review same	1.00	300.00
04/27/2015	JSL Review/analyze tax notices from Crawford County demanding payment of prepetition taxes and threatening a tax sale	0.50	150.00
	JSL Draft/revise letter to L. Bolla re: stay violations by Crawford County Tax Claim Bureau	0.70	210.00
05/06/2015	JSL Review/analyze correspondence from C. Torrie including Notice of Assessment for PA Sales Tax and discussion with C. Torrie re: same	0.50	150.00
05/08/2015	JSL Telephone call with and emails to/from R. Edmundson resolving PA Sale Tax notice of assessment and collection of Q4 2014 sales taxes	0.30	90.00
For professional services rendered		4.40	\$1,371.00

	<u>Amount</u>
Balance due	<u><u>\$1,371.00</u></u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
George T. Snyder	0.60	385.00	\$231.00
Jeanne S. Lofgren	3.80	300.00	\$1,140.00

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The Trustees of Conneaut Lake Park, Inc.
c/o The Economic Progress Alliance of
Crawford County
Attn: Mark Turner, Executive Director
789 Bessemer Street
Meadville, PA 16335

September 28, 2015
372.14 - Prep. of Fee Apps
Invoice # 290

LEGAL SERVICES RENDERED THROUGH AUGUST 31, 2015

Professional Services

		Hours	Amount
02/17/2015	GTS Review of invoices for inclusion in MOR	0.20	77.00
04/01/2015	JSL Review prebill statements for March 2015	1.00	300.00
04/06/2015	JSL Revise draft CLP invoices for March 2015 and send to C. Torrie for inclusion in April MOR	0.30	90.00
07/14/2015	JEF Preparation of the the Interim Fee Application from December 4, 2014-June 30, 2015.	3.20	592.00
	JEF Preparation of Interim Fee Application and exhibits. Emailed and conferenced with staff regarding invoices and totals.	2.10	388.50
07/15/2015	JEF Drafted exhibits and revised fee application.	3.20	592.00
07/16/2015	JEF Draft/revise fee application and related exhibits.	1.20	222.00
	JEF Revised fee application and exhibits and emailed complete draft to JSL.	0.30	55.50
07/28/2015	JSL Review draft first interim fee application	0.50	150.00
For professional services rendered		12.00	\$2,467.00
Balance due			<u>\$2,467.00</u>

Timekeeper Summary

Name	Hours	Rate	Amount
George T. Snyder	0.20	385.00	\$77.00
Jaclyn E. Faulds	10.00	185.00	\$1,850.00
Jeanne S. Lofgren	1.80	300.00	\$540.00

